

Voluntary Product Evaluation Template (VPAT)

Date: October 2014

Name of Product: RedShelf eReader

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Refer to the [ITIC Best Practices](#) for filling out the following form.

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Section 1194.21 Software Applications and Operating Systems

* Refer to (<http://www.access-board.gov/sec508/guide/1194.21.htm>) for details on the guidelines listed below.

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 WITH EXCEPTIONS	The RedShelf eReader allows navigation by keyboard controls. All text inputs have discernable text changes. However, keyboard controls can be used to scroll down the page without any textual feedback.
(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 WITH EXCEPTIONS	The RedShelf eReader disables context menus and right-clicking to comply with DRM restrictions.
(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	The RedShelf eReader does not override default browser focus indication.
(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	All icons used to convey information have alt tags and title attributes to convey equivalent information.
(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.	NOT APPLICABLE	The RedShelf eReader does not use bitmaps.
(f) Textual information shall be provided through operating system functions for	NOT APPLICABLE	The RedShelf eReader does not override any operating

displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.		system or browser text capabilities. All inputs use correct semantic HTML and use alt and title tags to indicate their purpose.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	SUPPORTS	User defined style sheets may be used to override any styling in the RedShelf eReader.
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	NOT APPLICABLE	The RedShelf eReader does not display animations.
(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 WITH EXCEPTIONS	Annotation color can be chosen by the user to group annotations.
(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.	NOT APPLICABLE	No option is provided to the user for color selection.
(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.	NOT APPLICABLE	No flashing or blinking text is used in the eReader.
(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 WITH EXCEPTIONS	All features requiring forms are supported except creating and editing annotations. Annotations are not currently supported for Assistive Technology.

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Section 1194.22 Web-based Internet information and applications		
* Refer to (http://www.access-board.gov/sec508/guide/1194.22.htm) for details on the guidelines listed below.		
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 WITH EXCEPTIONS	RedShelf is in the process of ePub development which will support alt tags on images if a publisher provides it. Drawn annotations do not support alt tags for descriptions.

		Images in the PDF reader do not support text equivalency but options are being explored.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	SUPPORTS	The RedShelf eReader does not currently contain any multimedia presentations.
(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 WITH EXCEPTIONS	Annotations use color for visual ordering. Annotations are not supported for use with Accessibility Software.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	SUPPORTS	The RedShelf eReader is readable without a style sheet.
(e) Redundant text links shall be provided for each active region of a server-side image map.	NOT APPLICABLE	The RedShelf eReader does not contain image maps.
(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	The RedShelf eReader does not contain image maps.
(g) Row and column headers shall be identified for data tables.	SUPPORTS WITH EXCEPTIONS	The ePub version of the RedShelf eReader supports this if its provided in the ePub from the publisher. The PDF version of the eReader does not support this.
(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 WITH EXCEPTIONS	The ePub version of the RedShelf eReader supports this if its provided in the ePub from the publisher. The PDF version of the eReader does not support this.
(i) Frames shall be titled with text that facilitates frame identification and navigation	NOT APPLICABLE	HTML Frames are not used to display any content to users.
(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 RedShelf eReader contains no animations that could cause flickers effects while reading.
(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.	DOES NOT SUPPORTS	RedShelf is currently exploring the options to develop a text-only page for content on an individual basis.

(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.	DOES NOT SUPPORTS	Browser support for JavaScript is currently required for reading. RedShelf is currently exploring options to remove this requirement.
(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 RedShelf eReader does not use any third-party plugins or applications.
(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 WITH EXCEPTIONS	All features requiring forms are supported except creating and editing annotations. Annotations are not currently supported for Assistive Technology.
(o) A method shall be provided that permits users to skip repetitive navigation links.	SUPPORTS	The RedShelf eReader allows navigation through a table of contents, bookmarking, creating notes, searching, and entering the page number.
(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 timed responses are required for any feature of the eReader.

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.

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Section 1194.23 Telecommunications Products		
* Refer to (http://www.access-board.gov/sec508/guide/1194.23.htm) for details on the guidelines listed below.		
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 capable of being turned on and off to allow the user to intermix speech with TTY use.	NOT APPLICABLE	

<p>(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.</p>	<p>NOT APPLICABLE</p>	
<p>(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.</p>	<p>NOT APPLICABLE</p>	
<p>(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.</p>	<p>NOT APPLICABLE</p>	
<p>(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.</p>	<p>NOT APPLICABLE</p>	
<p>(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.</p>	<p>NOT APPLICABLE</p>	
<p>(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.</p>	<p>NOT APPLICABLE</p>	
<p>(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.</p>	<p>NOT APPLICABLE</p>	
<p>(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.</p>	<p>NOT APPLICABLE</p>	
<p>(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-</p>	<p>NOT APPLICABLE</p>	

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.		
(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.	NOT APPLICABLE	
(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	
(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	
(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	

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Section 1194.24 Video and Multi-media Products		
* Refer to (http://www.access-board.gov/sec508/guide/1194.24.htm) for details on the guidelines listed below.		
Criteria	Supporting Features	Remarks and explanations
(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	NOT APPLICABLE	

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.		
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	NOT APPLICABLE	
(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	
(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	
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	NOT APPLICABLE	

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Section 1194.25 Self-Contained, Closed Products		
* Refer to (http://www.access-board.gov/sec508/guide/1194.25.htm) for details on the guidelines listed below.		
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.	NOT APPLICABLE	
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	NOT APPLICABLE	
(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	
(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	
(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	
(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	NOT APPLICABLE	

shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.		
(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	
(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.	NOT APPLICABLE	
(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	
(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	
(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	
(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 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.	NOT APPLICABLE	
(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	

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Section 1194.26 Desktop and Portable Computers		
* Refer to (http://www.access-board.gov/sec508/guide/1194.26.htm) for details on the guidelines listed below.		
Criteria	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with U1194.23 (k) (1) through (4).	NOT APPLICABLE	
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with U1194.23 (k) (1) through (4).	NOT APPLICABLE	
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require	NOT APPLICABLE	

the user to possess particular biological characteristics, shall also be provided.		
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards	NOT APPLICABLE	

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Section 1194.31 Functional Performance Criteria		
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.	SUPPORTS WITH EXCEPTIONS	Navigation of the document, bookmarking, reading, searching are supported using Assistive Technology. Annotations are not supported using Assistive Technology.
(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 WITH EXCEPTIONS	The RedShelf eReader allows the zooming of pages to increase text size. The highlight text popup may need additional zooming by the user to be visible if visually impaired.
(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 features of the eReader require 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.	SUPPORTS	No features of the eReader require audio information.
(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 features of the eReader 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.	SUPPORTS WITH EXCEPTIONS	RedShelf exposes keyboard controls and keyboard focus to Assistive Technology. No simultaneous actions are required to access a feature on RedShelf. Drawing of annotations does require mouse support.

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Section 1194.41 Information, documentation, and support

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.	SUPPORTS	RedShelf provides support in HTML 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	Users may email support staff or obtain the eReader Accessibility Statement from RedShelf.com.
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	SUPPORTS	Support for the RedShelf eReader is available by online support, email, and phone.

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