

Telecommunication Systems Compliance with the Americans with Disabilities Act (ADA)

This bulletin is intended to show compliance with the Section 508 of the Rehabilitation Act Subsection 1194.23 for Toshiba Telecommunication products. The following headings refer to the requirements of Subsection 1194.23 followed by the explanation of compliance from Toshiba America Information Systems, Inc. (TAIS). In addition to Section 508, this bulletin also contains information relating to the Federal Communication Commission (FCC), Section 255.

Section 508 of the ADA

Requirement 1194.23 (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.

TAIS Response:

TAIS complies with this requirement. An analog electrical (non-acoustic) telephone connected to a Toshiba recommended external gateway equipment interface is provided that can be used for connection with a TTY interface.

Requirement 1194.23 (b) – Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.

TAIS Response:

TAIS complies with this requirement. The integrity of TTY signals across TAIS telephone systems will be maintained so that any character loss or error on the TTY system is minimized.

Requirement 1194.23 (c) – Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.

TAIS Response:

- Toshiba PBX systems support this requirement.
- Toshiba voicemail systems currently do not transmit data in the 45.5 baud Baudot TTY protocol. However, if the TTY device is capable of DTMF generation the Toshiba Voicemail system is interoperable.

Depends on TTY functionality.

Requirement 1194.23 (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.

TAIS Response:

TAIS complies with this requirement. The voice mail system will repeat its prompts whenever there is no response from the user resulting in a timeout.

Requirement 1194.23 (e) – Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.

TAIS Response:

The Toshiba PBX system sends the caller ID information to the terminals connected to a Toshiba recommended external gateway equipment, which can also be interpreted by the TTY device.

Requirement 1194.23 (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.

TAIS Response:

TAIS complies with this requirement by using Toshiba recommended external gateway equipment with +/- 31dB range adjustment. Additionally, the Toshiba telephones provide separate volume adjustments for speaker and handset. For speakers, the total adjustment range is 40 dB in 2 dB increments. For handsets, the total range is 17 dB also in 2 dB increments.

Requirement 1194.23 (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.

TAIS Response:

Toshiba telephone handsets reset the volume to the default level after each use. The speakerphones do not follow this rule.

Requirement 1194.23 (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.

TAIS Response:

TAIS complies with this requirement. TAIS telephone equipment are compatible with hearing aid devices.

Requirement 1194.23 (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.

TAIS Response:

This requirement does not apply to TAIS products as it is unique to digital wireless equipment.

Requirement 1194.23 (j) – Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.

TAIS Response:

TAIS complies with this requirement. The integrity of TTY signals across TAIS telephone systems will be maintained so that any character loss or error on the TTY system is minimized.

Requirement 1194.23 (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.

TAIS Response:

TAIS complies with this requirement. A visually impaired person can operate each key without inadvertently activating multiple keys, i.e., all keys on TAIS telephones are tactilely discernible.

Requirement 1194.23 (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, or twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2 N) maximum.

TAIS Response:

TAIS complies with this requirement. The use of only one hand is required in the operation of TAIS telephone systems.

Requirement 1194.23 (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.

TAIS Response:

TAIS complies with this requirement. TAIS telephone systems do not support key repeat.

Requirement 1194.23 (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.

TAIS Response:

TAIS complies with this requirement. All key presses on the TAIS phones are accompanied by an audio feedback tone.

Sections 251 and 255 of the FCC

Toshiba is a recognized telecommunications systems manufacturer and is listed as a vendor under Section 255 of the Communications Act with the FCC.

At the FCC, “Section 255 Manufacturers of Equipment,” Toshiba is listed as a “Manufacturer of Equipment.” This is the link for your convenience: http://www.fcc.gov/cgb/dro/section255_manu.html

The IPedge system complies with Titles II, III and IV Sections 251 and 255 of the Telecommunications Act of 1996. Toshiba telecom systems with Toshiba recommended external gateway equipment as premise equipment work in conjunction with local carrier exchanges and comply with FCC Part 68 and UL.

All Toshiba telecom products, in Pure IP, TDM, or hybrid configurations, support Section 508 of the Workforce Investment Act of 1998.

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