

Mitel Network Accessibility Conformance Report

Revised Section 508 Edition

(Based on VPAT® Version 2.4Rev)

Name of Product/Version: Mitel 6905, 6910, 6920w, 6930w, 6940w IP Phones

Report Date: November 2022

Product Description: Voice over IP Business Phones

Contact Information: accessibility@mitel.com

Notes: N/A

Evaluation Methods Used: Manual testing

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 (No)
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.
- **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

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 [WCAG 2.0 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Supports	This requirement is fully met. All non-text content that is presented to the user has a text alternative.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Supports	This requirement is fully met. Either an alternative for time-based media or an audio track is provided that presents equivalent information for prerecorded video-only content.
1.2.2 Captions (Prerecorded) (Level A)	Partially supports	This requirement is only partially met. The video has short text in synchronized media, although the full sentences of the narration are not provided. This may affect users who are deaf or have a hearing loss access the auditory information in the synchronized media content through captions.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Supports	This requirement is fully met. An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media.
1.3.1 Info and Relationships (Level A)	Supports	This requirement is fully met.

Criteria	Conformance Level	Remarks and Explanations
		Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text.
1.3.2 Meaningful Sequence (Level A)	Supports	<p>This requirement is fully met.</p> <p>When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined.</p>
1.3.3 Sensory Characteristics (Level A)	Supports	<p>This requirement is fully met.</p> <p>Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound.</p>
1.4.1 Use of Color (Level A)	Supports	<p>This requirement is fully met.</p> <p>Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.</p>
1.4.2 Audio Control (Level A)	Supports	<p>This requirement is fully met.</p> <p>A mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level.</p>
2.1.1 Keyboard (Level A)	Supports	<p>This requirement is fully met.</p> <p>All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes.</p>

Criteria	Conformance Level	Remarks and Explanations
2.1.2 No Keyboard Trap (Level A)	Supports	This requirement is fully met. The current keyboard available functionalities do not cause a keyboard trap.
2.2.1 Timing Adjustable (Level A)	Supports	This requirement is fully met. The electronic support documentation does not include content with a timeout, that is adjustable or under the control of the end user.
2.2.2 Pause, Stop, Hide (Level A)	Supports	This requirement is fully met. All software updates, system alerts, or preload phase provide mechanisms for the user to stop or hide it.
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	This requirement is fully met. Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds.
2.4.1 Bypass Blocks (Level A)	Supports	This requirement is fully met. keyboard users to different locations of the user interface.
2.4.2 Page Titled (Level A)	Supports	This requirement is fully met. The electronic support documentation provides titles for each page.
2.4.3 Focus Order (Level A)	Supports	This requirement is fully met.

Criteria	Conformance Level	Remarks and Explanations
		Users can navigate sequentially through operational content. Focusable components receive focus in an order that preserves meaning and operability
2.4.4 Link Purpose (In Context) (Level A)	Supports	This requirement is fully met. The links provide meaningful text for identifying the content as the link.
3.1.1 Language of Page (Level A)	Supports	This requirement is fully met. The default human language of each Web page can be programmatically determined.
3.2.1 On Focus (Level A)	Supports	This requirement is fully met. The electronic support documentation does not cause a change of context on focus.
3.2.2 On Input (Level A)	Supports	This requirement is fully met. The electronic support documentation does not change the context/setting of the control itself when entering data or selecting a control.
3.3.1 Error Identification (Level A)	Supports	This requirement is fully met. If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text.
3.3.2 Labels or Instructions (Level A)	Supports	This requirement is fully met. The electronic support documentation provides labels or instructions when content requires user input.

Criteria	Conformance Level	Remarks and Explanations
4.1.1 Parsing (Level A)	Supports	This requirement is fully met. All UI elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique
4.1.2 Name, Role, Value (Level A)	Supports	This requirement is fully met. The electronic support documentation provides the correct names, role, state, and other important accessibility information for some user interface components.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not applicable	The electronic support documentation does not have live audio content.
1.2.5 Audio Description (Prerecorded) (Level AA)	Supports	This requirement is fully met. Audio description is provided for all prerecorded video content in synchronized media.
1.4.3 Contrast (Minimum) (Level AA)	Supports	This requirement is fully met. The visual presentation of text and images of text has a contrast ratio of at least 4.5:1.

Criteria	Conformance Level	Remarks and Explanations
1.4.4 Resize text (Level AA)	Supports	This requirement is fully met. Text is resized to 200% without a loss of content of functionality.
1.4.5 Images of Text (Level AA)	Supports	This requirement is fully met. Text is used to convey information rather than images of text.
2.4.5 Multiple Ways (Level AA)	Supports	This requirement is fully met. The electronic support documentation utilizes a fixed navigation of all tabs, search and shortcuts for locating screens.
2.4.6 Headings and Labels (Level AA)	Supports	This requirement is fully met. The headings and labels are clear and descriptive when they are provided.
2.4.7 Focus Visible (Level AA)	Supports	This requirement is fully met. The keyboard focus is always available when a UI component is operated.
3.1.2 Language of Parts (Level AA)	Not applicable	There is only one language on the web.
3.2.3 Consistent Navigation (Level AA)	Supports	This requirement is fully met. The electronic support documentation has a consistent navigation mechanism.
3.2.4 Consistent Identification (Level AA)	Supports	This requirement is fully met.

Criteria	Conformance Level	Remarks and Explanations
		The components of electronic support documentation are identified consistently.
3.3.3 Error Suggestion (Level AA)	Supports	This requirement is fully met. The electronic support documentation provides error suggestions.
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Not applicable	There is no content causing legal commitment or financial transactions.

Table 3: Success Criteria, Level AAA

Notes: Not evaluated.

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Notes:

Chapter 3: [Functional Performance Criteria \(FPC\)](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	<p>This requirement is only partially met.</p> <p>Number “5” has braille on the key, so that users can navigate the dial pad, but all function keys do not have any tactile identifications as below: “Contacts”, “Call history”, “Voicemail”, “Settings”, “Volume”, “Hang Up”, “Back”, “Pause”, “Mute” and “Speaker”.</p> <p>These exceptions may affect users with vision difficulties or impairments.</p>
302.2 With Limited Vision	Supports	<p>This requirement is fully met.</p> <p>All keys have visual symbols or characters with good contrast.</p>
302.3 Without Perception of Color	Supports	<p>This requirement is fully met.</p> <p>Color alone is not used to communicate meaning.</p>
302.4 Without Hearing	Supports	<p>This requirement is fully met.</p>

Criteria	Conformance Level	Remarks and Explanations
		When the phone rings, the visual cue on the screen and handset are also provided.
302.5 With Limited Hearing	Supports	<p>This requirement is fully met.</p> <p>6900 series IP Phone provides physical volume control. It also provides FCC-compliant primary inductive coils, permitting the phone to be used with inductively coupled assistive hearing devices.</p>
302.6 Without Speech	Supports	<p>This requirement is fully met.</p> <p>Speech is not required for input, control, or operation.</p>
302.7 With Limited Manipulation	Supports	<p>This requirement is fully met.</p> <p>All keys can be reached and operated using one hand and require minimal dexterity for ease of use by mobility impaired users.</p>
302.8 With Limited Reach and Strength	Supports	<p>This requirement is fully met.</p> <p>All keys can be operated with minimal force.</p>
302.9 With Limited Language, Cognitive, and Learning Abilities	Partially supports	<p>This requirement is only partially met.</p> <p>6900 series IP Phone provides guides and support for users with limited language,</p>

Criteria	Conformance Level	Remarks and Explanations
		cognitive and learning abilities depending on the user's experience. These may affect users with cognitive, language or learning disabilities.

Chapter 4: [Hardware](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality	Heading cell – no response required	Heading cell – no response required
402.1 General	Does not support	This requirement is not supported. 6900 series IP Phone does not support TTY or any means of connection to TTY. It will affect users with vision difficulties or impairments, including those using assistive technology.
402.2 Speech-Output Enabled	Does not support	This requirement is not supported. 6900 series IP Phone does not support built-in speech-out functions. It will affect users with vision difficulties or impairments, including those using assistive technology.

Criteria	Conformance Level	Remarks and Explanations
402.2.1 Information Displayed On-Screen	Does not support	<p>This requirement is not supported.</p> <p>6900 series IP Phone does not support built-in speech-out functions.</p> <p>It will affect users with vision difficulties or impairments, including those using assistive technology.</p>
402.2.2 Transactional Outputs	Not applicable	<p>6900 series IP Phone does not have a transaction feature.</p>
402.2.3 Speech Delivery Type and Coordination	Does not support	<p>This requirement is not supported.</p> <p>6900 series IP Phone does not support built-in speech-out functions.</p> <p>It will affect users with vision difficulties or impairments, including those using assistive technology.</p>
402.2.4 User Control	Does not support	<p>This requirement is not supported.</p> <p>6900 series IP Phone does not support built-in speech-out functions.</p> <p>It will affect users with vision difficulties or impairments, including those using assistive technology.</p>
402.2.5 Braille Instructions	Does not support	<p>This requirement is not supported.</p> <p>6900 series IP Phone does not support built-in speech-out functions.</p>

Criteria	Conformance Level	Remarks and Explanations
		It will affect users with vision difficulties or impairments.
402.3 Volume	Heading cell – no response required	Heading cell – no response required
402.3.1 Private Listening	Supports	This requirement is fully met. 6900 series IP Phone provides a mode of operation for controlling the volume.
402.3.2 Non-private Listening	Supports	This requirement is fully met. 6900 series IP Phone provides incremental volume control with output amplification up to a level of at least 65 dB.
402.4 Characters on Display Screens	Partially supports	This requirement is only partially met. The characters are dark colored with a light background, but characters displayed on the screen are not in a sans serif font. This may affect users with vision difficulties or impairments.
402.5 Characters on Variable Message Signs	Not Applicable	6900 series IP Phone does not have Variable Message Signs (VMS).
<u>403 Biometrics</u>	Heading cell – no response required	Heading cell – no response required
403.1 General	Not Applicable	Biometrics means is not provided.
<u>404 Preservation of Information Provided for Accessibility</u>	Heading cell – no response required	Heading cell – no response required
404.1 General	Supports	This requirement is fully met.

Criteria	Conformance Level	Remarks and Explanations
		The settings of volume and display about accessibility are preserved.
<u>405 Privacy</u>	Heading cell – no response required	Heading cell – no response required
405.1 General	Supports	This requirement is fully met.
<u>406 Standard Connections</u>	Heading cell – no response required	Heading cell – no response required
406.1 General	Supports	This requirement is fully met. 6900 series IP Phone is equipped with standard ports such as 10/100/1000 Gigabit Ethernet, Bluetooth 5.2, Wi-Fi and USB 2.0.
<u>407 Operable Parts</u>	Heading cell – no response required	Heading cell – no response required
407.2 Contrast	Supports	This requirement is fully met. All keys have visual symbols with good contrast.
<u>407.3 Input Controls</u>	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible	Partially supports	This requirement is only partially met. Number “5” has braille on the key, so that users can navigate the dial pad by touch without activation, but all function keys do not have any tactile identifications, listed as below: “Contacts”, “Call history”, “Voicemail”, “Settings”, “Volume”, “Hang Up”, “Back”, “Pause”, “Mute” and “Speaker”.

Criteria	Conformance Level	Remarks and Explanations
		These may affect users with vision difficulties or impairments.
407.3.2 Alphabetic Keys	Partially supports	<p>This requirement is only partially met.</p> <p>6940 IP phone provides a touch QWERTY keyboard, but other models do not provide.</p> <p>These may affect users with vision difficulties or impairments, or with learning/cognitive difficulties.</p>
407.3.3 Numeric Keys	Supports	<p>This requirement is fully met.</p> <p>The 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.</p>
407.4 Key Repeat	Not Applicable	There is no auto key repeat feature provided on the phone.
407.5 Timed Response	Not Applicable	There is no timed response feature provided on the phone.
407.6 Operation	Supports	<p>This requirement is fully met.</p> <p>6900 series IP Phone is operable with one hand and not require tight grasping, pinching, or twisting of the wrist.</p>
407.7 Tickets, Fare Cards, and Keycards	Not Applicable	6900 series IP Phone does not support any keycards/tickets/fare cards.
407.8 Reach Height and Depth	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and Explanations
407.8.1 Vertical Reference Plane	Supports	This requirement is fully met. Operable parts are positioned for a side reach or a forward reach determined with respect to a vertical reference plane.
407.8.1.1 Vertical Plane for Side Reach	Supports	This requirement is fully met. The vertical reference plane supports 48 inches (1220 mm) long minimum for side reach.
407.8.1.2 Vertical Plane for Forward Reach	Supports	This requirement is fully met. The vertical reference plane shall be 30 inches (760 mm) long minimum for forward reach.
407.8.2 Side Reach	Supports	This requirement is fully met. Operable parts providing a side reach conforms to 407.8.2.1 or 407.8.2.2.
407.8.2.1 Unobstructed Side Reach	Supports	This requirement is fully met. Where the operable part is located 10 inches (255 mm) or less beyond the vertical reference plane, the operable part supports 48 inches (1220 mm) high maximum and 15 inches (380 mm) high minimum above the floor.
407.8.2.2 Obstructed Side Reach	Supports	This requirement is fully met.

Criteria	Conformance Level	Remarks and Explanations
		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 supports 46 inches (1170 mm) high maximum and 15 inches (380 mm) high minimum above the floor.
407.8.3 Forward Reach	Supports	This requirement is fully met. Operable parts providing a forward reach conforms to 407.8.3.1 or 407.8.3.2.
407.8.3.1 Unobstructed Forward Reach	Supports	This requirement is fully met. 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 operable part supports 48 inches (1220 mm) high maximum and 15 inches (380 mm) high minimum above the floor.
407.8.3.2 Obstructed Forward Reach	Supports	This requirement is fully met. Where the operable part is located beyond the leading edge of the maximum protrusion within the length of the vertical reference plane, the operable part conforms to 407.8.3.2.
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach	Supports	This requirement is fully met.

Criteria	Conformance Level	Remarks and Explanations
		The height of the operable part conforms to Table 407.8.3.2.1.
407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach	Supports	This requirement is fully met. Knee and toe space under the phone can be 27 inches (685 mm) high minimum, 25 inches (635 mm) deep maximum, and 30 inches (760 mm) wide minimum and is clear of obstructions.
<u>408 Display Screens</u>	Heading cell – no response required	Heading cell – no response required
408.2 Visibility	Supports	This requirement is fully met. The display screen is visible from a point located 40 inches (1015 mm) above the floor space where the display screen is viewed.
408.3 Flashing	Supports	This requirement is fully met. Where 6900 series IP phone emits lights in flashes, there is no more than three flashes in any one-second period.
<u>409 Status Indicators</u>	Heading cell – no response required	Heading cell – no response required
409.1 General	Partially supports	This requirement is only partially met. The volume can be adjusted and discernible by sound during an active call, but mute and speaker key only have visual alerts.

Criteria	Conformance Level	Remarks and Explanations
		This may affect users with vision difficulties or impairments.
<u>410 Color Coding</u>	Heading cell – no response required	Heading cell – no response required
410.1 General	Supports	This requirement is fully met. The color coding is not used as the only means of conveying information.
<u>411 Audible Signals</u>	Heading cell – no response required	Heading cell – no response required
411.1 General	Supports	This requirement is fully met. The audible signals or cues is not used as the only means of conveying information.
<u>412 ICT with Two-Way Voice Communication</u>	Heading cell – no response required	Heading cell – no response required
<u>412.2 Volume Gain</u>	Heading cell – no response required	Heading cell – no response required
412.2.1 Volume Gain for Wireline Telephones	Supports	This requirement is fully met. Volume gain conforming to 47 CFR 68.317 is provided on analog and digital wireline telephones.
412.2.2 Volume Gain for Non-Wireline ICT	Not Applicable	6900 is a wireline phone.
<u>412.3 Interference Reduction and Magnetic Coupling</u>	Heading cell – no response required	Heading cell – no response required
412.3.1 Wireless Handsets	Supports	This requirement is fully met. 6930W and 6940W support a HAC cordless handset.
412.3.2 Wireline Handsets	Supports	This requirement is fully met.

Criteria	Conformance Level	Remarks and Explanations
		6900 series IP phone in the form of wireline handsets, including cordless handsets, conforms to TIA-1083-B.
412.4 Digital Encoding of Speech	Supports	This requirement is fully met. 6900 series IP phone transmits and receives speech that is digitally encoded in the manner specified by ITU-T Recommendation G.722.2 or IETF RFC 6716.
412.5 Real-Time Text Functionality	Not Applicable	Reserved for future
412.6 Caller ID	Partially supports	This requirement is only partially met. The caller ID is visible but not audible. This may affect users with vision difficulties or impairments.
412.7 Video Communication	Not Applicable	Video communication is not provided.
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required
412.8.1 TTY Connectability	Does not support	This requirement is not supported. 6900 series IP Phone has Ethernet switch but does not have a RJ11 analog telephone to connect to the PSTN directly. It will affect users with vision difficulties or impairments, including those using assistive technology.

Criteria	Conformance Level	Remarks and Explanations
412.8.2 Voice and Hearing Carry Over	Does not support	<p>This requirement is not supported.</p> <p>6900 series IP Phone does not support TTY directly.</p> <p>It will affect users with vision difficulties or impairments, including those using assistive technology.</p>
412.8.3 Signal Compatibility	Does not support	<p>This requirement is not supported.</p> <p>6900 series IP Phone does not support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols where the system interoperates with the PSTN.</p> <p>It will affect users with vision difficulties or impairments, including those using assistive technology.</p>
412.8.4 Voice Mail and Other Messaging Systems	Does not support	<p>This requirement is not supported.</p> <p>The voicemail does not support TTY.</p> <p>It will affect users with vision difficulties or impairments, including those using assistive technology.</p>
<u>413 Closed Caption Processing Technologies</u>	Heading cell – no response required	Heading cell – no response required
413.1.1 Decoding and Display of Closed Captions	Not applicable	6900 series IP Phone does not provide video with synchronized audio.

Criteria	Conformance Level	Remarks and Explanations
413.1.2 Pass-Through of Closed Caption Data	Not applicable	
<u>414 Audio Description Processing Technologies</u>	Heading cell – no response required	Heading cell – no response required
414.1.1 Digital Television Tuners	Not applicable	6900 series IP Phone does not provide video with synchronized audio.
414.1.2 Other ICT	Not applicable	
<u>415 User Controls for Captions and Audio Descriptions</u>	Heading cell – no response required	Heading cell – no response required
415.1.1 Caption Controls	Not applicable	6900 series IP Phone does not provide video with synchronized audio.
415.1.2 Audio Description Controls	Not applicable	

Chapter 5: [Software](#)

Notes: See Table 1 and 2 in WCAG 2.0 sections.

Chapter 6: [Support Documentation and Services](#)

Notes:

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
<u>602 Support Documentation</u>	Heading cell – no response required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Supports	This requirement is fully met. 6900 series IP Phone has information about settings of accessibility and compatibility Features.
602.3 Electronic Support Documentation	See <u>WCAG 2.x</u> section	See information in WCAG 2.x section

Criteria	Conformance Level	Remarks and Explanations
602.4 Alternate Formats for Non-Electronic Support Documentation	Supports	This requirement is fully met. 6900 series IP Phone provides paper manual as alternatives.
<u>603 Support Services</u>	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility and Compatibility Features	Supports	This requirement is fully met. The information is provided on support documentation.
603.3 Accommodation of Communication Needs	Supports	This requirement is fully met. We provide the email address accessibility@mitel.com to receive all general feedback. Customers may reach Mitel technical Support center (TSC) via Phone, or web form. All tickets open through phone or web forms are opened as Medium severity (P3) tickets. All Priority 1 tickets would be required to have a Phone live follow up or can be just open through the IVR.

Legal Disclaimer

This Mitel Network Accessibility Conformance Report provides details of the accessibility features of Mitel 6905, 6910, 6920w, 6930w, 6940w IP Phones as of November 2022. This document is for informational purposes only, and does not constitute legal advice, nor is it intended to represent a certification for compliance.