



Section 508 of the Rehabilitation Act  
Voluntary Product Accessibility Template® (VPAT™)

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## Embarcadero License Center 4.2

March 2015

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Corporate Headquarters  
 270 Battery Street, Suite  
 1000 San Francisco,  
 California 94111

EMEA Headquarters  
 York House 18 York Road  
 Maidenhead, Berkshire SL6  
 1SF, United Kingdom

Asia-Pacific Headquarters  
 L7. 313 La Trobe Street  
 Melbourne VIC 3000  
 Australia

## Overview

This document assesses Embarcadero License Center 4.2. In order to assess this product, a set of task deemed critical functions of the product were performed. The findings of those evaluations are contained in the VPAT. This information is current as of March 2015.

CRITERIA	REMARKS AND EXPLANATIONS
Section 1194.21 Software Applications and Operating Systems Accessibility	<a href="#">See Section 1194.21 below</a> – in cases where gaps have been found, please contact Embarcadero Support ( <a href="mailto:support@embarcadero.com">support@embarcadero.com</a> ) for tracking numbers
Section 1194.22 Web Accessibility	<a href="#">See Section 1194.22 below</a> - ELC is a server-based software application. ELC includes web-based administration interface.
Section 1194.23 Telecommunications Products	<a href="#">See Section 1194.23 below</a> - ELC is not a telecommunications product. This section doesn't apply.
Section 1194.24 Video and Multi-Media Productions	<a href="#">See Section 1194.24 below</a> - ELC is not a video or multi-media product. This section doesn't apply.
Section 1194.25 Self-Contained, Closed Products	<a href="#">See Section 1194.25 below</a> - ELC is not a self-contained or closed product. This section doesn't apply.
Section 1194.26 Desktop and Portable Computers	<a href="#">See Section 1194.26 below</a> - ELC is not a desktop or portable computer. This section doesn't apply.
Section 1194.31 Functional Performance	<a href="#">See Section 1194.31 below</a>
Section 1194.41 (a) Information, Documentation and Support	<a href="#">See Section 1194.41 below</a>

## VPAT DETAILS

### Section 1194.21: Software Applications and Operating Systems

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.21 (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.	Functions in the ELC administration interface can be partially performed using the keyboard.	Underlying technology richfaces <a href="http://richfaces.jboss.org/">http://richfaces.jboss.org/</a> used for ELC web UI has unresolved defect for 508 compliance <a href="https://issues.jboss.org/browse/RF-11841">https://issues.jboss.org/browse/RF-11841</a>

### Section 1194.21 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.21 (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.	ELC does not interfere with accessibility features provided by the operating system.	
1194.21 (c) A well-defined onscreen 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.	This is partially supported by ELC	Underlying technology richfaces <a href="http://richfaces.jboss.org/">http://richfaces.jboss.org/</a> used for ELC web UI has unresolved defect for 508 compliance <a href="https://issues.jboss.org/browse/RF-11841">https://issues.jboss.org/browse/RF-11841</a>

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<p>1194.21 (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.</p>	<p>Screen reader assistive technology is supported in ELC</p>	
<p>1194.21 (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.</p>	<p>Icons are consistent throughout the product when similar operations are performed in different user interfaces.</p>	

[Section 1194.21 continued](#)

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
<p>1194.21 (f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.</p>	<p>Screen reader assistive technology is supported in ELC.</p>	
<p>1194.21 (g) Applications shall not override user selected contrast and color selections and other individual display attributes.</p>	<p>This product does not adopt system colors and contrasts.</p>	
<p>1194.21 (h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.</p>	<p>The product does not use animation.</p>	
<p>1194.21 (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.</p>	<p>Color coding in reports is used in addition to numeric values.</p>	

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1194.21 (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.	This feature is not supported by ELC	
1194.21 (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.	There are no flashing or blinking elements beyond normal application features such as cursors in text editors. They do not blink at abnormally fast frequencies.	
1194.21 (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.	Screen reader assistive technology is partially supported in ELC. Some elements have been identified to not convey focus to the screen reading technologies.	

**Section 1194.22: Web-Based Internet Information and Applications**

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	This is not supported by ELC.	
1194.22 (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	The product doesn't use any multimedia content	
1194.22 (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Web based usage reports provide both color and text coded information.	
1194.22 (d) Documents shall be organized so they are readable without requiring an associated style sheet.	Usage reports are also exportable into CSV format.	

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1194.22 (e) Redundant text links shall be provided for each active region of a serverside image map.	The product does not use image map.	
1194.22 (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.	The product does not use image map.	
1194.22 (g) Row and column headers shall be identified for data tables.	This is supported by ELC	
1194.22 (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.	N/A. ELC does not use two or more levels for tables.	
1194.22 (i) Frames shall be titled with text that facilitates frame identification and navigation.	This is supported in ELC	
1194.22 (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	The ELC page loading does not cause any flickering	

Section 1194.22 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.22 (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 textonly page shall be updated whenever the primary page changes.	This is partially supported by ELC via command line interface. Not all Admin functionality is available from command line interface.	

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<p>1194.22 (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.</p>	<p>ELC uses javascript to display content which allows for assistive technologies like screen readers to interpret the UI forms.</p>	
<p>1194.22 (m) When a web page requires that an applet, plugin 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).</p>	<p>No applets or plugins are required for ELC</p>	
<p>1194.22 (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.</p>	<p>ELC forms allow for assistive technologies like screen readers to interpret the UI forms.</p>	
<p>1194.22 (o) A method shall be provided that permits users to skip repetitive navigation links.</p>	<p>That feature is not supported by ELC.</p>	
<p>1194.22 (p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.</p>	<p>N/A</p>	

**Section 1194.23: Telecommunications Products**

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
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VPAT for ELC 4.2

<p>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.</p>	<p>ELC is not considered a telecommunications product</p>	
<p>1194.23 (b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer nonproprietary standard TTY signal protocols.</p>	<p>N/A</p>	
<p>1194.23 (c) Voice mail, autoattendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	

Section 1194.23 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
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VPAT for ELC 4.2

<p>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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	

Section 1194.23 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
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VPAT for ELC 4.2

<p>1194.23 (j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, nonproprietary, 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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	

Section 1194.24: Video and Multimedia Products

VPAT for ELC 4.2

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
<p>1194.24 (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 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.</p>	<p>ELC is not considered a video or multimedia product</p>	
<p>1194.24 (b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.</p>	<p>N/A</p>	
<p>1194.24 (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.</p>	<p>N/A</p>	

Section 1194.24 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.24 (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.	N/A	
1194.24 (e) Display or presentation of alternate text presentation or audio descriptions shall be userselectable unless permanent.	N/A	

Section 1194.25 Self-contained, Closed Products

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.25 (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.	ELC is not a self contained product	
1194.25 (b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	N/A	
1194.25 (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).	N/A	

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<p>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.</p>	<p>N/A</p>	
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Section 1194.25 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
<p>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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	
<p>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.</p>	<p>N/A</p>	
<p>1194.25 (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</p>	<p>N/A</p>	

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<p>characteristics, shall also be provided.</p>		
<p>1194.25 (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.</p>	<p>N/A</p>	

Section 1194.25 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
<p>1194.25 (f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.</p>	<p>N/A</p>	
<p>1194.25 (g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.</p>	<p>N/A</p>	
<p>1194.25 (h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.</p>	<p>N/A</p>	

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1194.25 (i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	N/A	
1194.25 (j)(1) Products which are freestanding, nonportable, 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 (see Figure 1 of this part).	N/A	

Section 1194.25 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.25 (j)(2) Products which are freestanding, nonportable, 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.	N/A	
1194.25 (j)(3) Products which are freestanding, nonportable, 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.	N/A	

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1194.25 (j)(4) Products which are freestanding, nonportable, 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 (see Figure 2 of this part).	N/A	
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Section 1194.26: Desktop and Portable Computers

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.26 (a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).	ELC is not a desktop or portable computer	

Section 1194.26 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.26 (b) If a product utilizes touchscreens or touchoperated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	N/A	
1194.26 (c) 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.	N/A	
1194.26 (d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards.	N/A	

Section 1194.31: Functional Performance Criteria



CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.31 (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.	The product is responsive to screen reading technology.	
1194.31(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.	The product offers zooming capabilities for visually impaired.	

Section 1194.31 continued

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.31(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.	They product does not use audio or sound effects.	
1194.31(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.	They product does not use audio or sound effects.	

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1194.31(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.	User speech is not needed to run the product.	
1194.31(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.	Fine motor control is not needed to run the product.	

**Section 1194.41: Information, Documentation, and Support**

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.41(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge.	Supported	

**Section 1194.41 continued**

CRITERIA	SUPPORTING FEATURES	REMARKS AND EXPLANATIONS
1194.41(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.	Supported	
1194.41(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supported	



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