Overview

Learning Tree takes Section 508 and WCAG 2.0 compliance seriously and is currently working on a remediation plan that will include training for Section 508 and Web Content Accessibility Guidelines (WCAG) 2.0 Level A and AA requirements and will address items noted in the assessment where improvement is required for compliance. In addition, we will be working with Deque over the upcoming months to generate VPAT for Learning Tree's Online Live Delivery Platform.

The table below lists our vendor partners and their 508 and WCAG statuses:

Vendor	Compliance	VPAT
Adobe	Compliant	http://www.adobe.com/accessibility/compliance/adobe-connect-9-section-508-vpat.html
Hurix	Compliant	No VPAT available
SABA	Compliant	VPAT included below
ITProTV	Compliant	No VPAT available
Velsoft	Compliant	No VPAT available

Key Business Processes - Integration of Information and Communication Technologies (ICT)

Learning Tree offers online live and in-person training. We are committed to providing accommodations for our course participants with disabilities as stated in our Terms for All Courses / Accommodations for Disabilities:

https://www5.learningtree.com/tuition/terms-and-conditions.htm

Learning Tree regularly provides access to equipment, material, audio and visual resources to meet the needs of all customers. Examples of accommodations we commonly provide include –

- Large monitor
- Interpreters
- Large print materials
- Extra materials for aides (interpreters)
- Reserved seat for aides and student
- JAWS software which converts the picture and words on the screen to audio for visually impaired students
- Accommodations for service dogs
- Nursing room for mothers
- Ergonomic chairs
- And any unique, equipment needs that can be planned in advance.

Learning Tree operations teams perform weekly, monthly and quarterly reviews to ensure that all student learning experiences are equal.

Skills and Training Resources to Develop and Produce Accessible ICT Offerings

The core of our business is improving the knowledge, skill, abilities and performance of our class participants. Learning Tree provides all operational staff with training and the resources required to provide customers with accessible digital content and learning services include –

- Currently, we are under contract with Deque Systems Inc. (Deque), a MBE/WBE, highly experienced Accessibility Consulting Firm based in the Commonwealth of Virginia (2121 Cooperative Way; Herndon, VA 20171) to receive further consultation, training and resource support in expanding our digital accessibility, including, but not limited to, the requirements as outlined by the US Federal Government, as well as the requirements stated within the State of OK 508 Compliance policy. Deque has over 15 years of expertise working with Federal, State, Local higher education customers in providing accessibility consulting.
- An initial assessment of our application took place in December 2017.
- As part of this assessment, we are working on a remediation plan that includes training for Section 508 and Web Content Accessibility Guidelines (WCAG) 2.0 Level A and AA requirements.
- Learning Tree has internal personnel going through the DHS Trusted Tester Program to improve internal knowledge and to adequately develop an accessibility testing plan going forward.

Description of Development and Test Tools Used to Produce Accessible ICT

Currently, Learning Tree is in the process of developing our accessibility policy, governance, training, tool set, test cases, documentation and monitoring process. We are committed to provide effective tools for our employees based on advice from an external accessibility expert firm.

Learning Tree ensures that our training is delivered to our students via third party platforms that meet 508 compliance standards. Our LMS platform is developed by SABA, our online live platform is developed by Adobe, and our on-demand classes are created by Hurix.

The tools include a portfolio of toolsets, but are not specific to:

- aXe – for desktop automated accessibility testing
- Xcode accessibility plugin – for mobile (Apple platform) automated accessibility testing
- Color Contrast Analyser – to ensure conformant usage of colors
- NVDA – for manual screen reader testing
- VoiceOver and TalkBack – for manual mobile accessibility testing
- ARIA Specifications – to enhance accessibility of our advanced web-based content that uses dynamic interfaces
- Microsoft Inspect – used to identify name, role, state and value properties of Windows-based software elements
- WorldSpace suite of tools: WorldSpace Attest, Assure and Comply for development of accessible ICT offerings, and ensuring that the offerings remain accessible through maintenance processes.

Test Cases and Test Results are documented similar to the redacted example of a sample issue provided below:

Overview

The purpose of each image above the course list is not clear for the screen reader users.

Example Scenario:

When any element receives focus screen reader identifies it as 'link' which is not meaningful to hear.

User Story:

As a screen reader user

I want appropriate alternative text for all area images

So that I can identify the appropriate purpose for each image

How to Reproduce:

01. Navigate to URL "https://www.abc.xyz"

02. Move the focus to course list section

03. Observe that while focusing on each image, the purpose is not clear for the screen reader users

Remediation:

Make sure that each element reads appropriate description text when the screen reader encounters them.

Acceptance Criteria:

GIVEN: I am using screen reader

WHEN: I navigate to above mentioned areas images

THEN: I should hear the appropriate alternative text for each image

Traceability to WCAG 2.0:

https://www.w3.org/TR/2015/NOTE-WCAG20-TECHS-20150226/H24

Description of Corrective Actions to Resolve Accessibility Issues/Defects

Request for accessibility accommodations are currently handled based on our Terms for All Classes / Accommodations for Disabilities policy (referenced above).

https://www5.learningtree.com/tuition/terms-and-conditions.htm

We will also be defining a corrective action process for ICT accessibility as part of the development of our accessibility policy and governance process.

The current internal process for Accommodation for Disabilities is as follows:

Customer calls 1-800-843-8733 to identify their accommodation need. (as defined by our publicly available terms).

We track the following: Customer, event (class/date/time), accommodation need, communication to instructor and education center manager.

We contact the instructor and the education center manager to inform them of the customer's need.

The education center manager checks with the customer regularly to make sure their needs are met.

Online course evaluations provide an additional opportunity for the customer to provide feedback/satisfaction.

Accessibility issues are prioritized, from Critical to Minor, based on the impact they have on users. The issues are logged and tracked in our defect tracking system (a combination of Team Foundation Server, also known as TFS, and our internal development defect tracking tool called ER) and assigned to appropriate teams for resolution. Monthly reports are generated and analyzed, on accessibility issues, to determine ongoing defect prevention and training activities.

Any Customer Reported Issues are logged into Learning Tree's internal tracking system once the client accommodation requirement is determined. The requirement is tracked and routed to operations, including production, for implementation and the assigned instructor resource is notified. We are committed to provide quick resolutions for our customer, however the criticality of the issues drives the resolution time.

We also intend to build accessibility testing into our standard development practices, with advice from an external accessibility expert firm. Their process includes accessibility testing and remediation into each step from design to testing of our products. It involves:

- Design Annotations – Designers are trained to create annotations for developers that help in reducing accessibility issues in the output product.
- Developer Support – Developers are required to run a subset of accessibility tests to ensure that a few critical defects are identified and addressed during development phase. This can be performed using continuous integration platforms, or through browser extensions.
- Test Support – QA teams are trained to perform a combination of automated and manual accessibility testing. Any defects that are identified are logged into TFS, with appropriate criticality level assigned to it. The process is performed during System Test and Integration Test stages.
- Production Monitoring – We intend to continuously monitor our systems through automated tools for WCAG 2.0 Level A and AA violations.

We also intend to provide feedback capability, through our product pages, for users to provide accessibility related feedback/suggestions. Our Web Accessibility Coordinator will be looking at these suggestions and feedback on a regular basis to include them in product through planned updates/releases for the product

Alternate Methods for ICT Products Not Compliant with Accessibility Technical Standards

As per our Terms for All Courses / Accommodations for Disabilities, we regularly provide accommodations to meet the needs of our customers. The toll-free phone number for requesting accommodations is 1-800-843-8733. These requests are routed to our operations and IT teams that ensure that any reasonable accommodations requested are provided quickly (sometimes in a matter of hours) through a standard operating practice.

We also provide all students including those attending classes from any remote location the necessary computer equipment to view our training materials including special equipment needs. Our customer support

team is available to assist students with computer setup issues prior to and during our classes. We also offer interpreters upon request by a student.

Vendor Partner Adobe

Our AnyWare virtual platform runs on Adobe Connect, which has 508 compliance capabilities. Learning Tree has recently migrated to Adobe Connect Version 9.5 which will further integrates our 508 compliance capabilities. We are in the process of developing a VPAT for Learning Tree AnyWare. An attached version of Adobe's VPAT can also be viewed within the HTML link here:

http://www.adobe.com/accessibility/compliance/adobe-connect-9-section-508-vpat.html

Vendor Partner Hurix

Our online on demand courses are developed in partnership with Hurix. Hurix has also provided a 508-compliance document that formally outlines their 508 compliance policies and design/development methodology for 508 Compliance.

Vendor Partner ITProTV and Velsoft

In addition, our partners ITProTV and Velsoft are 508 and WCAG compliant.

Vendor Partner SABA

VOLUNTARY PRODUCT ACCESSIBLITY TEMPLATE

DATE: NOVEMBER 1ST 2015
PRODUCT NAME: SABA CLOUD
PRODUCT VERSION NUMBER: UPDATE 31
VENDOR COMPANY NAME: SABA SOFTWARE, INC.

Summary Table		
Voluntary Product Accessibility Template		
Criteria	Level of Support & Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems	Supports	
Section 1194.22 Web-based Internet Information and Applications	Supports	
Section 1194.23 Telecommunications Products	N/A	
Section 1194.24 Video and Multi-media Products	N/A	
Section 1194.25 Self-Contained, Closed Products	N/A	

<table>
<tr><td colspan="3">Summary Table
Voluntary Product Accessibility Template</td></tr>
<tr><td>Criteria</td><td>Level of Support &
Supporting Features</td><td>Remarks and explanations</td></tr>
<tr><td>Section 1194.26 Desktop and Portable Computers</td><td>N/A</td><td></td></tr>
<tr><td>Section 1194.31 Functional Performance Criteria</td><td>Supports</td><td></td></tr>
<tr><td>Section 1194.41 Information, Documentation and Support</td><td>Supports</td><td></td></tr>
</table>

<table>
<tr><td colspan="3">Section 1194.21 Software Applications and Operating Systems - Detail
Voluntary Product Accessibility Template</td></tr>
<tr><td>Criteria</td><td>Level of Support &
Supporting Features</td><td>Remarks and explanations</td></tr>
<tr><td>(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.</td><td>Supports</td><td></td></tr>
<tr><td>(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.</td><td>Supports</td><td></td></tr>
<tr><td>(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.</td><td>Supports</td><td></td></tr>
<tr><td>(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</td><td>Supports</td><td></td></tr>
</table>

Section 1194.21 Software Applications and Operating Systems - Detail Voluntary Product Accessibility Template		
Criteria	**Level of Support & Supporting Features**	**Remarks and explanations**
element, the information conveyed by the image must also be available in text.		
(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.	Supports	
(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.	Supports	
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supports	
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Supports	
(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	
(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.	Supports	
(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.	Supports	
(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	

Section 1194.22 Web-based Intranet and Internet information and Applications - Detail Voluntary Product Accessibility Template		
Criteria	**Level of Support & 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	
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Supports	
(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	
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supports	
(e) Redundant text links shall be provided for each active region of a server-side image map.	Supports	
(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.	Supports	
(g) Row and column headers shall be identified for data tables.	Supports	
(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	
(i) Frames shall be titled with text that facilitates frame identification and navigation	Supports	
(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	
(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	Supports	

Section 1194.22 Web-based Intranet and Internet information and Applications - Detail Voluntary Product Accessibility Template		
Criteria	**Level of Support & Supporting Features**	**Remarks and explanations**
accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.		
(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.	Supports	
(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).	Supports	
(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	
(o) A method shall be provided that permits users to skip repetitive navigation links.	Supports	
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Supports	

Note to 1194.22: The Board interprets paragraph (a) through (k) of this section as consistent with following priority 1 Checkpoints of the Web 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.

Section 1194.23 Telecommunications Products - Detail		
Voluntary Product Accessibility Template		
Criteria	Level of Support & 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.	N/A	
(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	N/A	
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	N/A	
(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.	N/A	
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	N/A	
(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.	N/A	

Section 1194.23 Telecommunications Products - Detail Voluntary Product Accessibility Template		
Criteria	**Level of Support & Supporting Features**	**Remarks and explanations**
(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.	N/A	
(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.	N/A	
(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.	N/A	
(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.	N/A	
(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.	N/A	
(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be	N/A	

Section 1194.23 Telecommunications Products - Detail
Voluntary Product Accessibility Template

Criteria	Level of Support & Supporting Features	Remarks and explanations
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.		
(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.	N/A	
(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.	N/A	

Section 1194.24 Video and Multi-media Products – Detail
Voluntary Product Accessibility Template

Criteria	Level of Support & 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 least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV	N/A	

Section 1194.24 Video and Multi-media Products – Detail
Voluntary Product Accessibility Template

Criteria	Level of Support & Supporting Features	Remarks and explanations
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.	N/A	
(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.	N/A	
(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	
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	N/A	

Section 1194.25 Self-Contained, Closed Products – Detail
Voluntary Product Accessibility Template

Criteria	Level of Support & 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	N/A	

Section 1194.25 Self-Contained, Closed Products – Detail Voluntary Product Accessibility Template		
Criteria	**Level of Support & Supporting Features**	**Remarks and explanations**
to the product. Personal headsets for private listening are not Assistive Technology.		
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	N/A	
(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	
(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.	N/A	
(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.	N/A	
(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.	N/A	
(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.	N/A	

Section 1194.25 Self-Contained, Closed Products – Detail Voluntary Product Accessibility Template		
Criteria	**Level of Support & Supporting Features**	**Remarks and explanations**
(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.	N/A	
(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	
(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.	N/A	
(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.	N/A	
(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	N/A	

Section 1194.25 Self-Contained, Closed Products – Detail		
Voluntary Product Accessibility Template		
Criteria	**Level of Support & Supporting Features**	**Remarks and explanations**
inches maximum and 15 inches minimum above the floor.		
(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.	N/A	

Section 1194.26 Desktop and Portable Computers		
Criteria	**Level of Support & Supporting Features**	**Remarks and explanations**
(a) All mechanically operated controls and keys shall comply with 1194.23 (k) (1) through (4).	N/A	
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with 1194.23 (k) (1) through (4).	N/A	
(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	
(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 – Detail	
	Voluntary Product Accessibility Template	
Criteria	**Level of Support & 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	
(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	
(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	
(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	
(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	
(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	

Section 1194.41 Information, Documentation and Support – Detail Voluntary Product Accessibility Template		
Criteria	**Level of Support & 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	
(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	
(c) Support services for products shall accommodate the communication needs of end-users with disabilities.	Supports	