



Accessibility Policy 2017

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Welcome

First and foremost, we are fully committed to ensuring that students' needs are met. We believe that this is a shared responsibility between technical/functional conformance to website accessibility guidelines, service-level accommodation, and accommodation via partnership with our campus liaisons in the tutoring, assessment, and/or disability services departments. We are 100% confident that students who use LSI solutions will be served. Through ongoing dialogue, shared experiences, and transparent accountability, our goal is that our partners share this confidence.

For our NetTutor partners: we will co-develop and publish a plan that offers a pathway for all students to have their needs met. It should look something like: student seeks online tutoring via NetTutor > student can navigate to/through NetTutor website successfully (and if not, then ABC activity) > student can engage (a NetTutor or campus-based) tutor successfully (and if not, then XYZ activity) > student has a successful tutoring session, or gets the help they need. Frankly, this is a best practice for all students because sometimes online tutoring may not be a good fit. When a tutor recognizes that a student is underprepared, for example, or struggles to build rapport, we escalate that session for review by our campus liaison who might get the instructor, disability officer, advisor/counselor, or campus-based tutoring center involved. With regard to accessibility considerations, NetTutor tutors are trained to offer service-level accommodations, whether or not the tutee is utilizing the accessibility features/tools provided by the technology.

For our WorldWideWhiteboard, RTR, and assessment partners: we will collaborate to co-develop and publish the process for how students with disabilities are supported.

For all partners, as described in the "[For Additional Assistance](#)" section of this document, the LSI Customer Support team is trained to investigate reported accessibility issues and respond to accommodation requests.

LSI Accessibility Statement

Our company philosophy is that accessibility is everyone's responsibility. We view accessibility, universal design, and usability as core components of user experience, and the linchpin is *inclusivity*. LSI is fully committed to ensuring our solutions are accessible for all users.

Our products and services are designed and developed to be in compliance with the Americans with Disabilities Act (ADA), Section 508 of the US Rehabilitation Act, and the Web Content Accessibility Guidelines (WCAG) 2.0 AA.

We have an ongoing commitment to improving the accessibility of our solutions. In addition to self-audits, third parties conduct regular audits of our solutions to ensure quality expectations are met and maintained. If a user reports an issue, we will respond within one business day. Resolution of reported accessibility issues will be addressed as the highest development priority.

Revised Standards (January 2017)

The excerpt below is taken from the Access-Board.gov website (<https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh>):

“On January 18, 2017, the Access Board published a final rule that jointly updates requirements for information and communication technology covered by Section 508 of the Rehabilitation Act and Section 255 of the Communication Act. The Section 508 Standards apply to electronic and information technology procured by the federal government, including computer hardware and software, websites, multimedia such as video, phone systems, and copiers. The Section 255 Guidelines address access to telecommunications products and services, and apply to manufacturers of telecommunication equipment.

The final rule jointly updates and reorganizes the Section 508 standards and Section 255 guidelines in response to market trends and innovations, such as the convergence of technologies. The refresh also harmonizes these requirements with other guidelines and standards both in the U.S. and abroad, including standards issued by the European Commission and with the Web Content Accessibility Guidelines (WCAG), a globally recognized voluntary consensus standard for web content and ICT.”

Section 508 of the Rehabilitation Act (includes WCAG 2.0)

The VPATs included herein are based on the guidelines listed in the Final Regulatory Impact Analysis, Table A-1. WCAG 2.0 Level A and Level AA Success Criteria (https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-regulatory-impact-analysis#_Toc471376905):

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description
1.1.1	Non-Text Content	A	1194.22(a)	All images, form image buttons, and image map hot spots have appropriate, equivalent alternative text. Embedded multimedia is identified via accessible text.
1.2.1	Prerecorded Audio-Only and Video-Only	A	1194.22(a)	A descriptive text transcript is provided for non-live, Web-based audio. A text or audio description is provided for non-live, Web-based video-only.
1.2.2	Captions (Prerecorded)	A	1194.22(b) and .24(c)	Synchronized captions are provided for non-live, Web-based video (YouTube videos, etc.).
1.2.3	Audio Description or Media Alternative (Prerecorded)	A	1194.22(b) and .24(d)	A descriptive text transcript OR audio description audio track is provided for non-live, Web-based video.
1.2.4	Captions (Live)	AA	1194.22(b) and .24(c)	Synchronized captions are provided for all live multimedia that contain audio (audio-only broadcasts, webcasts, video conferences, Flash animations, etc.).
1.2.5	Audio Description (Prerecorded)	AA	1194.22(b) and .24(d)	Audio descriptions are provided for all video content. NOTE: Only required if the video conveys content visually that is not available in the default audio track.
1.3.1	Information and Relationships	A	1194.22(e) through (h)	Semantic markup is used to designate headings, lists, and emphasized or special text. Tables are used for tabular data. Where necessary, data cells are associated with their headers. Table captions and summaries are used where appropriate.
1.3.2	Meaningful Sequence	A	New	The reading and navigation order (determined by code order) is logical and intuitive.

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description
1.3.3	Sensory Characteristics	A	New	Instructions do not rely on shape, size, or visual location (e.g., "Click the square icon to continue" or "Instructions are in the right-hand column").
1.4.1	Use of Color	A	1194.22(c) and .21(i)	Color is not used as the sole method of conveying content or distinguishing visual elements.
1.4.2	Audio Control	A	New	A mechanism is provided to stop, pause, mute, or adjust volume for audio that automatically plays on a page for more than 3 seconds.
1.4.3	Contrast (Minimum)	AA	New	Text and images of text have a contrast ratio of at least 4.5:1. Large text (over 18 point or 14 point bold) has a contrast ratio of at least 3:1.
1.4.4	Resize Text	AA	New	The page is readable and functional when the text size is doubled.
1.4.5	Images of Text	AA	1194.21(f)	If the same visual presentation can be made using text alone, an image is not used to present that text.
2.1.1	Keyboard	A	1194.21(a)	All page functionality is available using the keyboard, unless the functionality cannot be accomplished in any known way using a keyboard.
2.1.2	No Keyboard Trap	A	New	Keyboard focus is never locked or trapped at one particular page element ensuring that the user can navigate to and away from all navigable page elements using only a keyboard typically, by using tab and shift-tab.
2.2.1	Timing Adjustable	A	1194.22(p)	If a page or application has a time limit, the user is given options to turn off, adjust, or extend that time limit. This is not a requirement for real-time events (e.g., an auction), where the time limit is absolutely required, or if the time limit is longer than 20 hours.

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description
2.2.2	Pause, Stop, Hide	A	1194.21(h)	Automatically moving, blinking, or scrolling content that lasts longer than 5 seconds can be paused, stopped, or hidden by the user. Automatically updating content can be paused, stopped, or hidden by the user, or the user can manually control the timing of the updates.
2.3.1	Three Flashes or Below Threshold	A	1194.21(k) and .22(j)	No page content flashes more than three times per second unless that flashing content is sufficiently small and the flashes are of low contrast and do not contain too much red. (See general flash and red flash thresholds.)
2.4.1	Bypass Blocks	A	1194.22(o)	A link is provided to skip navigation and other page elements that are repeated across Web pages.
2.4.2	Page Title	A	1194.22(i)	The Web page has a descriptive and informative page title.
2.4.3	Focus Order	A	New	The navigation order of links, form elements, etc., is logical and intuitive.
2.4.4	Link Purpose (In Context)	A	New	The purpose of each link (or form image button or image map hot spot) can be determined from the link text alone or from the link text and its context (e.g., surrounding paragraph, list item, table cell, or table headers).
2.4.5	Multiple Ways	AA	New	Multiple ways are available to find other Web pages on the site—at least two of a list of related pages, table of contents, site map, site search, or list of all available Web pages.
2.4.6	Headings and Labels	AA	New	Page headings and labels for form and interactive controls are informative. Avoid duplicating heading (e.g., “More Details”) or label text (e.g., “First Name”) unless the structure provides adequate differentiation between them.
2.4.7	Focus Visible	AA	1194.21(c)	It is visually apparent which page element has the current keyboard focus (i.e., as you tab through the page, you can see where you are).

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description
3.1.1	Language of Page	A	New	The language of the page is identified using the HTML lang attribute.
3.1.2	Language of Parts	AA	New	The language of page content that is in a different language is identified.
3.2.1	On Focus	A	New	When a page element receives focus, it does not result in a substantial change to the page, the spawning of a pop-up window, an additional change of keyboard focus, or any other change that could confuse or disorient the user.
3.2.2	On Input	A	1194.21(l) and .22(n)	When a user inputs information or interacts with a control, it does not result in a substantial change to the page, the spawning of a pop-up window, an additional change of keyboard focus, or any other change that could confuse or disorient the user unless the user is informed of the change ahead of time.
3.2.3	Consistent Navigation	AA	New	Navigation links that are repeated on Web pages do not change order when navigating through the site.
3.2.4	Consistent Identification	AA	1194.22(e)	Elements that have the same functionality across multiple Web pages are consistently identified. For example, a printer icon at the top of each page should always be labeled the same way.
3.3.1	Error Identification	A	1194.21(l) and .22(n)	Form fields that require responses in a specific format, value, or length provide this information in a way that is readily available to assistive technology (e.g., within the element's label or within the element's title attribute). When form validation errors are presented, they must be available in plain text.
3.3.2	Labels or Instructions	A	1194.21(l) and .22(n)	Sufficient labels, cues, and instructions for required interactive elements are provided e.g., instructions, examples, properly positioned form labels, or fieldsets and legends.
3.3.3	Error Suggestion	AA	New	If an input error is detected (via client-side or server-side validation), provide suggestions for fixing the input.

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description
3.3.4	Error Prevention (Legal, Financial, Data)	AA	New	If the user can change or delete legal, financial, or test data, those changes or deletions can be reversed, verified, or confirmed.
4.1.1	Parsing	A	New	Significant HTML/XHTML validation/parsing errors are avoided.
4.1.2	Name, Role, Value	A	1194.21(d)	User interface components have their name and role available to assistive technology. The values (including states and properties) of interface components that can be changed by the user are also available to assistive technology

Section 255 of the Communications Act

For the solutions that include our methods for web-based communication, VPATs included herein also used relevant portions of the Revised 255 Guidelines (<https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines#appendix-b>):

Chapter 6: Support Documentation and Services

Guideline	Heading	Description
602.3	Electronic Support Documentation	Documentation in electronic format, including Web-based self-service support, shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0
602.4	Alternate Formats for Non-Electronic Support Documentation	Where support documentation is only provided in non-electronic formats, alternate formats usable by individuals with disabilities shall be provided upon request.
603.3	Accommodation of Communication Needs	Support services shall be provided directly to the user or through a referral to a point of contact. Such ICT support services shall accommodate the communication needs of individuals with disabilities.

NetTutor VPAT

Date: July 24, 2017

Name of product: NetTutor

Contact for more information: accessibility@link-systems.com

System Requirements

NetTutor is browser-based and HTML5-compliant, offering support across a wide variety of browsers and platforms, including mobile devices.

To communicate using audio and video, the user needs to have the latest Adobe Flash Player installed and enabled. No other plug-ins are required.

NetTutor Accessibility Tools/Features

- Accessibility Enhanced Mode – students can select this mode to enter a text-only environment. The student's account will remember this preference the next time they log in. Tutors are aware of students using this mode, and the tutoring service will accommodate text-only functionality.
- Text-to-speech – when users type onto the whiteboard using the single-line text entry or into the chat area, this tool reads the text aloud. Tutors will ensure they give ample time for the reader to complete before entering another line of text.

Supported Assistive Technologies (AT)

NetTutor is designed to work with all major screen readers, and our testing process involves thoroughly checking any new features using JAWS, NVDA, and VoiceOver. NetTutor is also designed to work with screen magnifiers (e.g. Freedom Scientific MAGic) and speech recognition programs (e.g., Dragon NaturallySpeaking).

How a Student Connects with a Tutor Using a Screen Reader

1. Student launches NetTutor from their LMS and chooses their group/subject.
2. Student navigates to and selects the "accessibility enhanced" link.
3. Student selects the link "Ask Net Tutor - Live one to one tutoring. Tutors are available for this group right now" to work with a tutor.
4. If the tutor is not immediately available, student will be placed in line. The wait page will identify their place in line and suggest what they might do while waiting.
5. When the tutor selects to go live with that student, their screen reader will read their activity and the text-to-speech function will read the tutor's comments aloud.
6. In session text remains navigable by arrowing up, which triggers the screen reader.

Development & QA Tools

Before new features are released to our testing environment, they've gone through accessibility testing. Our developers have integrated the aXe accessibility tool into their local coding environments, and they will not release features that throw errors. After a new feature is released, it goes through two additional rounds of testing: testing by our product development team and our QA team. Both of these rounds of testing involve checking the feature using aXe and the WAVE accessibility tool, as well as assistive technology software.

Browser/AT Combinations

Because they are the most common, these are the combinations of browsers and assistive technologies that we use during development and quality assurance:

- JAWS with Internet Explorer
- NVDA with Firefox
- VoiceOver with Safari

Section 508 (including WCAG2.0)

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description	Status	Comment
1.1.1	Non-Text Content	A	1194.22(a)	All images, form image buttons, and image map hot spots have appropriate, equivalent alternative text. Embedded multimedia is identified via accessible text.	Supports with Exceptions	Supported by Accessibility Enhanced mode
1.2.1	Prerecorded Audio-Only and Video-Only	A	1194.22(a)	A descriptive text transcript is provided for non-live, Web-based audio. A text or audio description is provided for non-live, Web-based video-only.	Not Applicable	NetTutor does not use non-live, Web-based audio or non-live, Web-based video-only.
1.2.2	Captions (Prerecorded)	A	1194.22(b) and .24(c)	Synchronized captions are provided for non-live, Web-based video (YouTube videos, etc.).	Supports	
1.2.3	Audio Description or Media Alternative (Prerecorded)	A	1194.22(b) and .24(d)	A descriptive text transcript OR audio description audio track is provided for non-live, Web-based video.	Supports	There are two "how to" videos on the wait screen for a live tutor. Transcripts can be provided upon request.
1.2.4	Captions (Live)	AA	1194.22(b) and .24(c)	Synchronized captions are provided for all live multimedia that contain audio (audio-only broadcasts, webcasts, video conferences, Flash animations, etc.).	Not Applicable	Accessibility Enhanced mode does not use audio
1.2.5	Audio Description (Prerecorded)	AA	1194.22(b) and .24(d)	Audio descriptions are provided for all video content. NOTE: Only required if the video conveys content visually that is not available in the default audio track.	Does not Support	(Relates to 1.2.3) These are YouTube videos for which YouTube does not support this functionality.

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description	Status	Comment
1.3.1	Information and Relationships	A	1194.22(e) through (h)	Semantic markup is used to designate headings, lists, and emphasized or special text. Tables are used for tabular data. Where necessary, data cells are associated with their headers. Table captions and summaries are used where appropriate.	Supports with Exceptions	Supported by Accessibility Enhanced mode
1.3.2	Meaningful Sequence	A	New	The reading and navigation order (determined by code order) is logical and intuitive.	Supports with Exceptions	Supported by Accessibility Enhanced mode
1.3.3	Sensory Characteristics	A	New	Instructions do not rely on shape, size, or visual location (e.g., "Click the square icon to continue" or "Instructions are in the right-hand column").	Supports	
1.4.1	Use of Color	A	1194.22(c) and .21(i)	Color is not used as the sole method of conveying content or distinguishing visual elements.	Supports	
1.4.2	Audio Control	A	New	A mechanism is provided to stop, pause, mute, or adjust volume for audio that automatically plays on a page for more than 3 seconds.	Not Applicable	
1.4.3	Contrast (Minimum)	AA	New	Text and images of text have a contrast ratio of at least 4.5:1. Large text (over 18 point or 14 point bold) has a contrast ratio of at least 3:1.	Supports with Exceptions	Supported by Accessibility Enhanced mode
1.4.4	Resize Text	AA	New	The page is readable and functional when the text size is doubled.	Supports	
1.4.5	Images of Text	AA	1194.21(f)	If the same visual presentation can be made using text alone, an image is not used to present that text.	Supports	

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description	Status	Comment
2.1.1	Keyboard	A	1194.21(a)	All page functionality is available using the keyboard, unless the functionality cannot be accomplished in any known way using a keyboard.	Supports with Exception	Supported by Accessibility Enhanced mode
2.1.2	No Keyboard Trap	A	New	Keyboard focus is never locked or trapped at one particular page element ensuring that the user can navigate to and away from all navigable page elements using only a keyboard typically, by using tab and shift-tab.	Supports with Exceptions	Supported by Accessibility Enhanced mode
2.2.1	Timing Adjustable	A	1194.22(p)	If a page or application has a time limit, the user is given options to turn off, adjust, or extend that time limit. This is not a requirement for real-time events (e.g., an auction), where the time limit is absolutely required, or if the time limit is longer than 20 hours.	Supports	
2.2.2	Pause, Stop, Hide	A	1194.21(h)	Automatically moving, blinking, or scrolling content that lasts longer than 5 seconds can be paused, stopped, or hidden by the user. Automatically updating content can be paused, stopped, or hidden by the user, or the user can manually control the timing of the updates.	Supports	
2.3.1	Three Flashes or Below Threshold	A	1194.21(k) and .22(j)	No page content flashes more than three times per second unless that flashing content is sufficiently small and the flashes are of low contrast and do not contain too much red. (See general flash and red flash thresholds.)	Supports	

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description	Status	Comment
2.4.1	Bypass Blocks	A	1194.22(o)	A link is provided to skip navigation and other page elements that are repeated across Web pages.	Not Applicable	NetTutor does not have blocks of content that are repeated across Web pages.
2.4.2	Page Title	A	1194.22(i)	The Web page has a descriptive and informative page title.	Supports	
2.4.3	Focus Order	A	New	The navigation order of links, form elements, etc., is logical and intuitive.	Supports	
2.4.4	Link Purpose (In Context)	A	New	The purpose of each link (or form image button or image map hot spot) can be determined from the link text alone or from the link text and its context (e.g., surrounding paragraph, list item, table cell, or table headers).	Supports	
2.4.5	Multiple Ways	AA	New	Multiple ways are available to find other Web pages on the site—at least two of a list of related pages, table of contents, site map, site search, or list of all available Web pages.	Supports	
2.4.6	Headings and Labels	AA	New	Page headings and labels for form and interactive controls are informative. Avoid duplicating heading (e.g., “More Details”) or label text (e.g., “First Name”) unless the structure provides adequate differentiation between them.	Supports	
2.4.7	Focus Visible	AA	1194.21(c)	It is visually apparent which page element has the current keyboard focus (i.e., as you tab through the page, you can see where you are).	Supports with Exceptions	Supported by Accessibility Enhanced mode
3.1.1	Language of Page	A	New	The language of the page is identified using the HTML lang attribute.	Supports	

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description	Status	Comment
3.1.2	Language of Parts	AA	New	The language of page content that is in a different language is identified.	Not Applicable	Multiple languages aren't used on NetTutor pages.
3.2.1	On Focus	A	New	When a page element receives focus, it does not result in a substantial change to the page, the spawning of a pop-up window, an additional change of keyboard focus, or any other change that could confuse or disorient the user.	Supports	
3.2.2	On Input	A	1194.21(l) and .22(n)	When a user inputs information or interacts with a control, it does not result in a substantial change to the page, the spawning of a pop-up window, an additional change of keyboard focus, or any other change that could confuse or disorient the user unless the user is informed of the change ahead of time.	Supports	
3.2.3	Consistent Navigation	AA	New	Navigation links that are repeated on Web pages do not change order when navigating through the site.	Not Applicable	Navigation links are not repeated across pages.
3.2.4	Consistent Identification	AA	1194.22(e)	Elements that have the same functionality across multiple Web pages are consistently identified. For example, a printer icon at the top of each page should always be labeled the same way.	Supports	

Success Criterion	Heading	WCAG2.0 Level	Corresponding 508 Reference	Description	Status	Comment
3.3.1	Error Identification	A	1194.21(l) and .22(n)	Form fields that require responses in a specific format, value, or length provide this information in a way that is readily available to assistive technology (e.g., within the element's label or within the element's title attribute). When form validation errors are presented, they must be available in plain text.	Supports	
3.3.2	Labels or Instructions	A	1194.21(l) and .22(n)	Sufficient labels, cues, and instructions for required interactive elements are provided e.g., instructions, examples, properly positioned form labels, or fieldsets and legends.	Supports with Exceptions	Supported by Accessibility Enhanced mode
3.3.3	Error Suggestion	AA	New	If an input error is detected (via client-side or server-side validation), provide suggestions for fixing the input.	Supports	
3.3.4	Error Prevention (Legal, Financial, Data)	AA	New	If the user can change or delete legal, financial, or test data, those changes or deletions can be reversed, verified, or confirmed.	Not Applicable	Students using NetTutor cannot change or delete legal, financial, or test data.
4.1.1	Parsing	A	New	Significant HTML/XHTML validation/parsing errors are avoided.	Supports	
4.1.2	Name, Role, Value	A	1194.21(d)	User interface components have their name and role available to assistive technology. The values (including states and properties) of interface components that can be changed by the user are also available to assistive technology	Supports with Exceptions	Supported by Accessibility Enhanced mode

Section 255 (Chapter 6)

Guideline	Heading	Description	Status	Comment
602.3	Electronic Support Documentation	Documentation in electronic format, including Web-based self-service support, shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0	Supports with Exceptions	<p>NetTutor uses Jira Service Desk for its support system. More information on the accessibility of that system can be found at:</p> <p>https://confluence.atlassian.com/display/ACCESSIBILITY/JIRA+Service+Desk+VPAT+for+Section+508+compliance</p> <p>The NetTutor user manual is an accessible PDF and support videos have captions.</p>
602.4	Alternate Formats for Non-Electronic Support Documentation	Where support documentation is only provided in non-electronic formats, alternate formats usable by individuals with disabilities shall be provided upon request.	Not Applicable	NetTutor does not have non-electronic support documentation.
603.3	Accommodation of Communication Needs	Support services shall be provided directly to the user or through a referral to a point of contact. Such ICT support services shall accommodate the communication needs of individuals with disabilities.	Supports	

For Additional Assistance

If you have an issue viewing any material on link-systems.com, nettutor.com, or another LSI website because of difficulties with assistive technologies or to request an accommodation, please contact LSI Customer Support for assistance:

- Submit an electronic ticket:
<https://linksystems.atlassian.net/servicedesk/customer/portal/6>
- Send an email to accessibility@link-systems.com
- Call 813-674-0660 x204 to speak with a friendly agent M-F 9a-9p ET

Please indicate the nature of your accessibility problem, the preferred format in which you want to receive any materials, and your contact information.

Students, faculty, and staff at our partner campuses may also contact the Disability Services department on their campus. Disability Services department representatives may escalate their request by speaking with an LSI Product Coordinator, who will be assigned at the beginning of our partnership in an escalation protocol.

Accommodation requests will be responded to by the next business day.

Legal Disclaimer

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