

***VitalSource Bookshelf Mac OSX Desktop Platform 7.0 (2429)***

***VPAT***

Presented to: VitalSource Technologies, Inc.

Contacts:

Rick Johnson  
VP of Product Development & Sales Engineering

[rick.johnson@ingramdigital.com](mailto:rick.johnson@ingramdigital.com)

Nick Brown

Bookshelf Product Manager

[Nick.brown@ingromcontent.com](mailto:Nick.brown@ingromcontent.com)

Blake Perdue

Senior Product Manager

Blake.Perdue@ingramcontent.com

Prepared By:

Tech For All, Inc.

[*www.TFAConsulting.com*](http://www.TFAConsulting.com)

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# VPAT for Bookshelf Macintosh Desktop Platform

TFA’s team evaluated the Bookshelf Macintosh 7.0 (2429) Desktop platform for accessibility, and identified and addressed various accessibility features and functionalities associated with the platform. The evaluation generated sufficient information to assess the degree to which the platform conforms with the Section 508 Accessibility Standards. TFA concludes that overall, the Bookshelf Macintosh Desktop platform mostly conforms with the standards with a few exceptions that are identified in the VPAT document. The VPAT for the platform is based on the findings in this evaluation. *Note that the scope of the VPAT document is the Bookshelf platform itself, and does not include the content (books).*

The Information Technology Industry Council (ITIC) has published recommended language to be used in completing VPAT documents that has been designed to create simplicity and uniformity/consistency in VPATs presented by a variety of suppliers. In preparing the VPAT for the Bookshelf Macintosh Desktop platform, TFA has used the ITIC-recommended *VPAT Summary Description and Suggested Language for Completing VPAT* that can be found in *Appendix A*. The VPAT document includes the following tables: Table 1: Section 1194.21 Software Applications and Operating Systems, Table 2: Section 1194.31 Functional Performance Criteria, and Table 3: Section 1194.41 Information, Documentation, and Support.

Based on this evaluation and information published on the ITIC website (<http://www.itic.org>), TFA presents the following VPAT document for the *Bookshelf Macintosh 7.0 (2429) Desktop platform*, as laid out in the following tables:

## Table 1: Section 1194.21 Software Applications and Operating Systems – Detail

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| **Criteria** | **Level of Support & Supporting Features** | **Remarks and explanations** |
| (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. | **Supports with Exceptions** | Bookshelf provides keyboard access to nearly all functions and exposes information to assistive technology. VoiceOver is required for interacting with book content, such as selecting text for notes and highlights or activating hyperlinks.  A few user interface elements do not receive visible focus without VoiceOver enabled (e.g. color controls in the Preferences dialog). |
| (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. | **Supports** | Bookshelf does not interfere with MacOS accessibility features including VoiceOver and Zoom. |
| (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. | **Supports** | Clear indication of focus is provided throughout the application user interface when VoiceOver is turned on, although a small number of user interface elements do not receive visible focus without VoiceOver enabled.  Focus is programmatically exposed everywhere in the application and the book media. |
| (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. | **Supports with Exceptions** | Bookshelf exposes information to assistive technology. Text descriptions/labels are assigned to all controls. All control roles are correctly identified except for highlighter drop-down in the book reader which is identified as a button. |
| (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** | Bookshelf uses images and icons in a consistent manner throughout the interface. |
| (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** | Bookshelf exposes information to assistive technology. |
| (g) Applications shall not override user selected contrast and color selections and other individual display attributes. | **Supports** | Bookshelf does not interfere with or override user-selected display settings. |
| (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** | Bookshelf supports the display of non-animated images as an alternate or poster frame. For XML based content the use of this is at the discretion of the content creator. PDF based content does not use animations. |
| (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** | Bookshelf does not use color as the sole means of conveying information and can be used in grayscale screen mode without loss of comprehension. The only use of color coding is for highlighters. Since the user chooses the colors, they are at liberty to choose colors they can readily distinguish. |
| (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** | The built-in color controls are extremely flexible and OSX high contrast mode works with the application. |
| (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** | Bookshelf does not use flashing or blinking text, objects, or elements. |
| (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** | Bookshelf exposes form control information to assistive technology. |

## Table 2: Section 1194.31 Functional Performance Criteria – Detail

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| **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 with Exceptions** | Bookshelf provides access to nearly all functions when used with VoiceOver. Limitations include the inability to create highlights/notes in PDF media, and inability to use a braille display to read any of the book media. |
| (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 with Exceptions** | Bookshelf provides zooming of book contents, and works well with OS X Zoom and color settings. Several user interface elements have insufficient color contrast. |
| (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** | Bookshelf has a read aloud function, and visually reading the text serves as a second mode for deaf or hard of hearing users. |
| (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** | Enhanced auditory support is provided by the computer in the form of a volume control and earphone output. |
| (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** | Bookshelf does not have modes of operation that require speech. |
| (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 with Exceptions** | Most features of Bookshelf are accessible using the keyboard; however, standard keyboard access (outside of VoiceOver) does not support selecting text for highlighting, creating notes or activating hyperlinks within a book.  A small number of user interface elements do not receive visible focus without VoiceOver enabled. |

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## Table 3: Section 1194.41 Information, Documentation, and Support

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| **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** | Bookshelf provides free online help in HTML format. Alternate formats are available upon request. |
| (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** | Bookshelf help provides documentation for access technology users. |
| (c) Support services for products shall accommodate the communication needs of end-users with disabilities. | **Supports** | Support for Bookshelf products is available via the online support pages, and phone. |

# Concluding Remarks

The accessibility assessment conducted for this project indicates that the Bookshelf Macintosh 7.0 (2429) Desktop platform is mostly accessible and conforms with the Section 508 Accessibility Standards, with a few exceptions.

TFA is confident that the issues identified are not unduly complex. By remediating the accessibility and usability issues listed in this report and by implementing TFA’s recommendations, VitalSource can achieve not only conformance with the Section 508 standards, but also be fully usable by its customers with disabilities.

# Appendix A: Background on VPAT

To facilitate effective communication between producers of products and services and those who acquire them concerning the accessibility of specific products, an accessibility information template was created by a joint government and industry effort. The VPAT document was created by the Information Technology Industry Council ([www.itic.org](http://www.itic.org)) based on Section 508 Accessibility Standards established by the United States Access Board ([www.access-board.gov](http://www.access-board.gov)) in 2001.

The use of the VPAT as an evaluation tool has enabled companies and organizations to self-document and formally attest to conformance and nonconformance with specific Section 508 accessibility requirements point by point. Its purpose is to assist federal and state contracting officials and other purchasers in making preliminary assessments regarding the availability of commercial Information and Communication Technologies (ICT) products and services with features that support accessibility. Vendors are frequently required to submit VPATs with their responses to RFPs and other government purchasing proposals.

For each ICT product category to which Section 508 applies, three different requirements need to be addressed. (Complete information regarding these requirements can be found at the [www.section508.gov](http://www.section508.gov) and [www.itic.org](http://www.itic.org) websites):

1. Specific Requirements, corresponding to specific product groups:
   * Section 1194.21 Software Applications and Operating Systems
   * Section 1194.22 Web-based Internet Information and Applications
   * Section 1194.23 Telecommunications Products
   * Section 1194.24 Video and Multimedia Products
   * Section 1194.25 Self-Contained, Closed Products
   * Section 1194.26 Desktop and Portable Computers
2. Section 1194.31 Functional Performance Criteria, “Functional Performance Criteria,” applying to all product groups
3. Section 1194.41 Information, Documentation, and Support: General Requirement, “Information, Documentation, and Support,” applying to the information provided *accompanying* all ICT products. Thus FAQ’s, Manuals and the like must all be accessible.

Considering that the VPAT carries important information for the procurement official, it is essential that a supplier/producer provide an accurately prepared VPAT that fairly and responsibly represents its product and/or service.

**Suggested Language for Completing VPAT**

In order to simplify the task of conducting market research assessments for procurement officials or customers, ITIC ([www.itic.org](http://www.itic.org)) has developed suggested language for use when filling out a VPAT document. The following table provides the suggested language.

*Column 1 - Supporting Features*

*Column 2 - Remarks and Explanations*

Feedback from procurement officials and customers shows that providing further explanation regarding features and exceptions is especially helpful. Use this column to detail how the product addresses the standard or criteria by:

* Listing accessibility features or features that are accessible
* Detailing where in the product an exception occurs

Explaining equivalent methods of facilitation (definition of "equivalent facilitation" -see 36 CFR 1194.5.)

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| **Supporting Features** | **Recommended Language** |
| Supports | Use this language when you determine the product fully meets the letter and intent of the Criteria. |
| Supports with Exceptions | Use this language when you determine the product does not fully meet the letter and intent of the Criteria, but provides some level of access relative to the Criteria. |
| Supports through Equivalent Facilitation | Use this language when you have identified an alternate way to meet the intent of the Criteria or when the product does not fully meet the intent of the Criteria. |
| Supports when combined with Compatible Assistive Technology | Use this language when you determine the product fully meets the letter and intent of the Criteria when used in combination with Compatible Assistive Technology. For example, many software programs can provide speech output when combined with a compatible screen reader (commonly used assistive technology for people who are blind). |
| Does not Support | Use this language when you determine the product does not meet the letter or intent of the Criteria. |
| Not Applicable | Use this language when you determine that the Criteria do not apply to the specific product. |
| Not Applicable - Fundamental Alteration Exception Applies | Use this language when you determine a Fundamental Alteration of the product would be required to meet the Criteria (see the access board standards for the definition of "fundamental alteration"). |