

Innovative Systems CVAA Compliance Statement

History

The Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA) was signed into law on October 8, 2010 by President Obama. The CVAA updates federal communications law to increase the access of persons with disabilities to modern communications. It follows a string of laws, passed in the 1980s and 1990s that were designed to ensure that telephone and television services would be accessible to all Americans with disabilities. These laws were not able to keep up with the fast paced technological changes over the past decade. The CVAA contains protections to enable people with disabilities to access broadband, digital and mobile innovations.

Title I requires advanced communication services (ACS) and products to be accessible by people with disabilities. These services are defined as (1) interconnected voice over Internet protocol (VoIP) service; (2) non-interconnected VoIP service; (3) electronic messaging service; and (4) interoperable video conferencing service. Title I of the CVAA creates industry recordkeeping obligations.

Title II Section 255 requires manufacturers and service providers to ensure that their equipment and services are accessible to individuals with disabilities, if such compatibility is readily achievable. These rules were further extended to interconnected voice over Internet protocol (VoIP) service providers and equipment manufacturers.

Section 716 requires providers of ACS and manufactures of equipment used for those services to be accessible to and usable by individuals with disabilities, unless doing so is not achievable.

Section 718 requires manufactures of telephones used with public mobile services and providers of mobile service to ensure that the functions of the Internet browser they include or arrange to be included in such telephones are accessible to and usable by individuals who are blind or have a visual impairment, unless doing so is not achievable.

The “readily achievable” standard requires companies to incorporate features that are easily accomplishable without much difficulty or expense. Companies must balance the costs and nature of the access required with their available resources when determining what is readily achievable.

The following statement details the compliance of the Innovative Systems products subject to the CVAA.

CVAA Compliance Statement

InnoStream Platform IPTV Middleware

This section describes the compliance of the InnoStream Platform IPTV Middleware service to The Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA).

Title II – Video Programming

Requires video programming that is closed captioned on TV to be closed captioned when distributed on the Internet

Compliance: Not Applicable.

Requires video programming distributors, providers, and owners to convey emergency information in a manner that is accessible to people who are blind or visually impaired.

Compliance: Yes – Our current configuration of the EAS alerts provides both visual and audio messaging, and our middleware provides for a force-tune feature.

Requires video programming equipment to be capable of displaying closed captions, to devices with screens smaller than 13 inches, and requires these devices to be able to pass through video descriptions and emergency information that is accessible to people who are blind or visually impaired, if technical feasible and achievable.

Compliance: Yes – Our middleware provides a system overlay that removes TV size requirements.

Requires devices designed to record TV programs to pass through closed captions, video descriptions, and emergency information so viewers are able to turn on/off the closed captions and make video descriptions and emergency information audible.

Compliance: Yes – Closed caption information is saved with all recordings.

Requires interconnection mechanisms to carry the information necessary to permit the display of closed captions and make video description and emergency information audible.

Compliance: Yes – Closed caption and emergency information is maintained through all of our equipment.

Requires user controls for TVs and other video programming devices to be accessible to people who are blind or visually impaired, and requires TVs and other video programming devices to have a button, key, icon, or comparable mechanism designated for activating closed captioning and video description.

Compliance: Yes – The Potenza Remote Control has the pound button (#) that allows users to toggle CC on or off on both live and recorded programs, and the Royal Remote Control provides a CC button for users to toggle CC on or off on both live and recorded programs. This is applicable to Innovative Systems provided remote controls.

Requires on-screen text menus and program guides displayed on TV by set-top boxes to be accessible to people who are blind or visually impaired, and requires set-top boxes to have a button, key, icon, or comparable mechanism designated for activating closed captioning (when built-in to the set-top box).

Compliance: Yes – The Potenza Remote Control has the pound (#) button that allows users to toggle CC on or off on both live and recorded programs, and the Royal Remote Control provides a CC button for users to toggle CC on or off on both live and recorded programs. This is applicable to Innovative Systems provided remote controls.

Accessibility requirements for televisions, set-top boxes, and similar devices that receive or play back video programming and are manufactured, leased, or requested after December 20, 2016.

Compliance: Yes – The MyTVs application with Android and iOS devices provides Audible Accessibility reading.

Requires covered devices to enable consumers to adjust closed captions in a variety of ways, including their color (both text and background color), size, fonts, opacity, edge attributes and language selection. This applies to equipment manufactured on or after January 1, 2014.

Compliance: Yes – The current IPTV STBs developed and manufactured after January 1, 2014 will meet the Enhanced Closed Captioning requirements. This includes the following IPTV STBs -

Amino: x4x, x5x, Live (5050), Entone4, Entone5, and Amino 6

Innovative Systems: IS-5112W

ADB: 1720 and 1761

Older STBs might support some enhanced features but not all, and might require a replacement if requested from the end customer.

Usability

Full Function

Compliance: Partial – As stated above there are some accessibility restrictions using older STBs that could be deployed.

Documentation

Compliance: Not Applicable – The InnoStream User’s Guide and other material are provided to the service provider. The service provider may modify this material as needed and provide it or additional documentation to the end user.

Documentation – Product Information

Compliance: Not Applicable – The InnoStream User’s Guide and other material are provided to the service provider. The service provider may modify this material as needed and provide it or additional documentation to the end user.

Documentation Support

Compliance: Not Applicable – Documentation support is provided to the service provider. End user documentation support provided by the service provider.

Technical Support

Compliance: Not Applicable – Technical support is provided to the service provider. End user technical support is provided by the service provider.