

NCR ATMs and the ADA “Final Rule”

An NCR Position Paper



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On September 15, 2010, the U.S. Department of Justice published final regulations revising its 1991 ADA Title III regulations, including its ADA Standards for Accessible Design (the "1991 Standards").

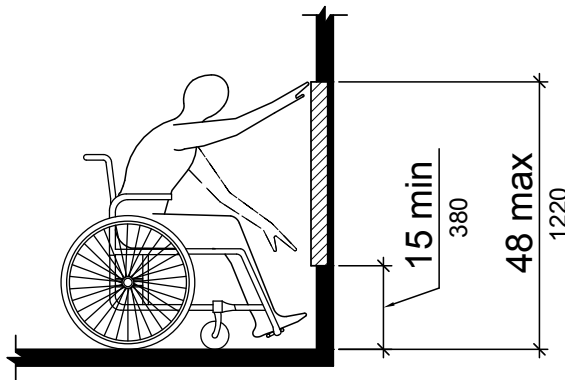
The final regulations, including the 2010 Standards for Accessible Design (the "2010 Standards") will take effect March 15, 2011. The 2010 Standards contain newly mandated, communications-related requirements for ATMs that will benefit users who are blind or have low vision. The Department of Justice has stated that these requirements are auxiliary aids and services that must be provided on existing ATMs unless doing so would result in a fundamental alteration to the public accommodation's program or would cause undue burdens.

Each financial institution must consult its legal advisors for guidance on how to comply with the final regulations, including the 2010 Standards. Please note that the 2010 Standards, like the 1991 Standards, apply to ATM-related elements that go beyond the ATM itself (e.g. the accessible route to the ATM and the clear floor or ground space adjacent to the ATM).

HEIGHT AND REACH

2010 Standards Requirement: Where a forward or side reach is unobstructed, the high reach shall be 48 inches maximum and the low reach shall be 15 inches minimum above the finish floor "(AFF)" or ground.

Operable parts shall be placed within one or more of the reach ranges



NCR Personas and SelfServ ATMS have been designed to meet the height and reach requirements in accordance with the 2010 Standards. For wheelchair users, the ATM offers optimized parallel and front approach, providing easy access, security and private space if installed according to the specifications in site preparation documentation.

To comply with the 2010 Standards, the ATM must be installed for either parallel or forward approach. Both approaches ensure that the height of the highest consumer interface element is no higher than 1220 mm (48.0 in.) from the sidewalk level.

An ATM installed prior to March 15, 2012 in compliance with the 54" AFF maximum reach range (for the highest operable part) for a side approach of the 1991 Standards will not have to be lowered to meet the new 48" AFF maximum reach range for a side approach until it is altered. Each financial institution should consult its legal advisors on what constitutes an alteration that would trigger compliance with the 2010 Standards.

The highest operable point is the height of the highest consumer interface element when the ATM is in use. The top FDK (function display key) of the 15.0 inch display is considered to be the highest operable point of NCR SelfServ and Personas ATMs. It lays within the 2010 Standards reach requirements. Provided that the software application is designed to NCR guidelines, this point also applies for the touch screen variant.

PRIVACY

2010 Standards Requirement: Automatic teller machines shall provide the opportunity for the same degree of privacy of input and output available to all individuals.

Currently, 'blank screen' functionality is a configurable feature in NCR APTRA Advance NDC. The screen can be configured to be 'blanked' either by the user or the insertion of an industry standard connector into an enhanced audio headjack. Voice guidance can also be configured to provide repeatable and interruptible voice instructions.

NCR APTRA Edge will include the 'blank screen' functionality in the upcoming release 3.02 as a standard feature. Efforts are currently underway to develop

solutions for prior releases of NCR APTRA Edge. Prior to the release of NCR APTRA Edge 3.02, 'blank screen' functionality can be implemented through an NCR professional services engagement.

SPEECH OUTPUT

2010 Standards Requirement: Machines shall be speech enabled. Operating instructions and orientation, visible transaction prompts, user input verification, error messages, and all displayed information for full use shall be accessible to and independently usable by individuals with vision impairments. Speech shall be delivered through a mechanism that is readily available to all users, including but not limited to, an industry standard connector or a telephone handset. Speech shall be recorded or digitized human, or synthesized.

Advertisements and other similar information shall not be required to be audible unless they convey information that can be used in the transaction being conducted.

Advisory note: If an ATM provides additional functions such as dispensing coupons, selling theater tickets, or providing copies of monthly statements, all such functions must be available to customers using speech output. To avoid confusion at the ATM, the method of initiating the speech mode should be easily discoverable and should not require specialized training.

Voice guidance is a standard feature of NCR APTRA Edge that conforms to the ATM Consumer Flow and uses a standard "Text-to-Speech" engine to provide voice lead-through for customer transactions. Voice guidance is an option that can be turned on or off

through a simple data dictionary entry. Voice guidance on NCR APTRA Edge is also supported in a multi-vendor environment assuming all the ATMs have private audio jacks. In a multi-vendor environment, a Professionals Services engagement is recommended to ensure the proper configuration. NCR APTRA Edge requires an IP network.

The current release of NCR APTRA Advance NDC (release 3.00.30 and higher) support the "Text-to-Speech" Voice Guidance capability. Voice Guidance requires the installation of the Nuance RealSpeak Solo "Text-to-Speech" product, as well as enabling the Voice Guidance feature on the ATM. Host systems that currently support the OS/2 US NDC+ Voice Guidance "Wav" file solution, do not require any additional host message interface changes, whereas those systems that do not currently support this solution will require interface changes to support Voice Guidance. The Voice Guidance XML file, as well as "session preferences" screens will need to be created regardless of what the host supports. This is a responsibility of the host.

For NCR APTRA Advance NDC, Voice Guidance can be implemented through an NCR Professional Services engagement.

NCR will not be offering any supplemental solutions for OS/2 as support for this product has reached end of life.



INPUT CONTROLS

2010 Standards Requirement: At least one tactilely discernible input control shall be provided for each function. Where provided, key surfaces not on active areas of display screens, shall be raised above surrounding surfaces. Where membrane keys are the only method of input, each shall be tactilely discernible from surrounding surfaces and adjacent keys.

All keys used to operate NCR SelfServ and Personas ATMs are tactually discernible. Key surfaces are raised above the surrounding surface by a minimum of 1/25 inch (1 mm). The outer edges of key surfaces have a maximum radius of 1/50 inch (0.5 mm).

NUMERIC KEYS

2010 Standards Requirement: Numeric keys shall be arranged in a 12-key ascending or descending telephone keypad layout. The number five key shall be tactilely distinct from the other keys.

All Personas and SelfServ keypads are arranged in a 12-key ascending layout and have a tactilely distinct number five key.



FUNCTION KEYS

2010 Standards Requirement: Function keys shall contrast visually from background surfaces. Characters and symbols on key surfaces shall contrast visually from key surfaces. Visual contrast shall be either light-on-dark or dark-on-light.

Function key surfaces shall have tactile symbols as follows: Enter or Proceed key: raised circle; Clear or Correct key: raised left arrow; Cancel key: raised letter ex; Add Value key: raised plus sign; Decrease Value key: raised minus sign.

NCR function keys, characters and symbols on Personas and SelfServ ATMs contrast visually from their respective surfaces and therefore are in compliance with 2010 ADA Standards.

Function keys on SelfServ ATMs include the tactile symbols presented by the ADA: Enter or Proceed key: raised circle; Clear or Correct key: raised left arrow; Cancel key: raised letter ex; Add Value key: raised plus sign; Decrease Value key: raised minus sign.

Pin Pads on Personas ATMs replace the raised left arrow on the Clear or Correct key with a vertical bar. We are currently confirming whether this Pin Pad will remain compliant with the introduction of the 2010 ADA standards.



DISPLAY SCREEN

2010 Standards Requirement: The display screen shall be visible from a point located 40 inches (1015 mm) above the center of the clear floor space in front of the machine. (EXCEPTION: Drive-up only automatic teller machines)

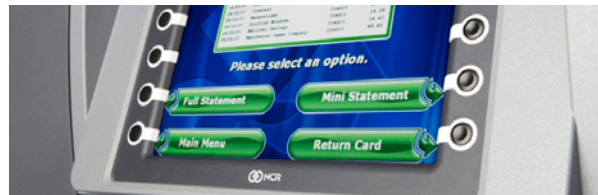
Characters displayed on the screen shall be in a sans serif font. Characters shall be 3/16 inch (4.8 mm) high minimum based on the uppercase letter "I". Characters shall contrast with their background with either light characters on a dark background or dark characters on a light background.

All Personas and SelfServ displays are visible from a point located 40 inches above the center of the clear floor space in front of the machine if installed in accordance with ADA accessibility requirements & NCR Site Preparation Documentation.

All characters displayed by either NCR APTRA Edge or NCR APTRA Advance NDC are sans serif and comply with the 3/16 inch height requirement based on a 16 x 32 display matrix.

BRaille INSTRUCTIONS

2010 Standards Requirement: Braille instructions for initiating the speech mode shall be provided.



Braille shall be contracted (Grade 2). Braille dots shall have a domed or rounded shape. The indication of an uppercase letter or letters shall only be used before the first word of sentences, proper nouns and names, individual letters of the alphabet, initials, and acronyms.

Braille shall be positioned below the corresponding text. If text is multi-lined, Braille shall be placed below the entire text. Braille shall be separated 3/8 inch (9.5 mm) minimum from any other tactile characters and 3/8 inch (9.5 mm) minimum from raised borders and decorative elements.

The 2010 Standards require that the ATM have instructions in Braille indicating how speech output is initiated. Generally, this means that there must be instructions informing the user to insert his or her personal earphone in the jack in order to hear the speech output.

The 2010 Standards require these Braille instructions to be fixed to the ATM. NCR Braille labels are designed to help the visually impaired easily locate the Voice Guidance headphone jack on NCR SelfServ and Personas terminals. NCR can provide Voice Guidance Braille labels that will meet this ADA requirement, while matching Personas and SelfServ exterior fascia.

NCR Corporation
3097 Satellite Boulevard · Duluth, Georgia 30096
USA
For more information, visit www.ncr.com