

### **1.3.5 National Policy-based Requirements [L.34.1.3.5]**

***Since the establishment of the National Communication Systems (NCS) in 1964, AT&T has been developing National Security/Emergency Preparedness (NS/EP) capabilities for the circuit and packed-switched public network. As a member of the President's National Security Telecommunications Advisory Committee (NSTAC), AT&T has been supporting Federal Government needs for priority communications since 1982.***

When confronted with an actual or potential emergency, Government Agencies rely on the telecommunications infrastructure to mitigate the situation. Under these conditions, Agencies need priority access to the telecommunications services provided through Network.

Supporting the Government during an emergency situation requires prioritization of service providers' resources. Agencies must receive initial access to the services to prioritize the restoration or provision of mission critical services. As emerging technologies and services are incorporated into the telecommunications infrastructure, the continuity of emergency preparedness must be maintained. Whether an Agencies' voice service is circuit switched or Internet protocol (IP)-based is immaterial. New services must follow the policies and procedures established by the National Communications System (NCS). A comprehensive National Security/Emergency Preparedness (NS/EP) Program is required to maintain a focused response during emergency situations.

Agencies must provide disabled Federal employees with access and use of information that is comparable to information provided to nondisabled Federal employees. Agencies require service providers who offer assistive technology solutions that support Section 508 provisions, while working under limited



budgets and expanding missions. When persons with disabilities have comparable access, they can execute operations in accordance with their Agency’s mission.

**AT&T’s NS/EP Program and Solutions to Meet Section 508 Provisions**

This section describes the approach to satisfy the NS/EP functionality and provide assistive technology solutions. Priority services for NS/EP are architected into [REDACTED] and operate a program office tasked specifically to address emergency preparedness. The same NS/EP principles and features are incorporated into emerging technologies to maintain the continuity of emergency services, as defined by the NCS.

Through partnerships and a service portfolio, Agencies have assistive technology solutions that meet the provisions of Section 508. The approach to NS/EP and assistive technology solutions is described in **Table 1.3.5-1**.

SECTION	DESCRIPTION
Section 1.3.5.a	Describes AT&T’s approach to satisfying NS/EP functionality: <ul style="list-style-type: none"> <li>• Government Emergency Telecommunications Services (GETS)</li> <li>• Wireless Priority Services (WPS)</li> <li>• Telecommunications Service Provisioning</li> <li>• Next generation emergency telecommunications services</li> </ul>
Section 1.3.5.b	Describes AT&T’s protection methods for Signaling System 7 (SS7) and satellite command links: <ul style="list-style-type: none"> <li>• More than a third of the SS7 network messages are encrypted</li> <li>• SS7 network access points are carefully screens the to filter disruptive messages</li> <li>• Operational access to the SS7 network is restricted to a limited number of employees</li> <li>• AT&amp;T encrypts satellite command links to protect Government traffic</li> </ul>
Section 1.3.5.c	Describes how AT&T’s network architecture provides service in the National Capital Region (NCR): <ul style="list-style-type: none"> <li>• Redundant equipment configurations</li> <li>• Resilient transport facilities</li> <li>• Agencies are provided continuity of operations (COOP) in NCR by AT&amp;T network</li> </ul>
Section 1.3.5.d	Describes AT&T’s approach for providing solutions to meet Section 508 provision for identified services: <ul style="list-style-type: none"> <li>• Team partners who are experienced with providing assistive technology and training</li> <li>• AT&amp;T’s capabilities are captured through voluntary product templates (VPATs)</li> </ul>

**Table 1.3.5-1: Response Summary for Section 1.3.5.** Agencies obtain a comprehensive and proven NS/EP Program to provide telecommunications services during emergency situations. An experienced AT&T Team, incorporating assistive technology features, provides solutions and simplifies compliance with Section 508.

Supporting the Government’s response during an emergency situation is of the highest priority.

### 1.3.5.a Approach to NS/EP Functional Requirements [L.34.1.3.5.a]

(a) Describe the offeror’s approach to satisfy each NS/EP basic functional requirement listed in Section C.5.2.2.1.1. [L.34.1.3.5.a]

During emergency situations, Government Agencies require uninhibited access to the public telecommunications infrastructure to coordinate the necessary response. Telecommunications procedures established by the NCS, in accordance with Executive Order 12472, were developed so critical Government and industry needs are met when an actual or potential emergency threatens the security or socio-economic structure or the U.S. The response to the NCS procedures and policies is a set of NS/EP Programs that provides priority telecommunications services when an actual or potential emergency threatens. Agencies experience resilient voice and data connection through a comprehensive suite of NS/EP services, as summarized in **Table 1.3.5.a-1**.

*Agencies depend on the telecom infrastructure to respond to an emergency situation.*

NS/EP PROGRAMS	DESCRIPTION AND BENEFITS
GETS	<ul style="list-style-type: none"> <li>Priority call processing provides Government GETS subscribers access to AT&amp;T voice network during emergency situations</li> <li>Critical users have access to GETS network 24x7 through universal NS/EP access number, [REDACTED]</li> </ul>
Wireless Priority Service	<ul style="list-style-type: none"> <li>Priority cellular network access for Government wireless subscribers</li> <li>Critical users dial [REDACTED] to queue for priority access to cellular transponder</li> </ul>
Telecommunication Service Priority NS/EP	Provides Government Agencies with priority service in restoring or provisioning service
Number Translation (NT)	Provides critical users the ability to eliminate capture of call detail records and caller identification making calls nontraceable
Non-Traceability Voice Service	

**Table 1.3.5.a-1: Approach to NS/EP Services.** Agencies benefit from a comprehensive suite of NS/EP services. Additionally, Agencies have access to the next generation GETS features under development that provide priority access for a wide variety of services and applications.

Agencies benefit from extensive experience and capabilities in providing NS/EP services to the Federal Government.

**Table 1.3.5.a-2** demonstrates the relationship of 14 functional requirements (C.5.2.1) to 17 NS/EP services (C.5.2.2). NS/EP functional requirements are

met through a combination of the existing GETS features (including nontraceability, where applicable), the Telecommunications Service Priority (TSP) Program, the [REDACTED] and the inherent commercial characteristics of the various service offerings.

### **1.3.5.a.1 Government Emergency Telecommunication Services (GETS) and GETS Non Traceability Option.**

GETS provides the most mature set of NS/EP capabilities. **Table 1.3.5.a-2**

*When there is an emergency, Agencies require priority access to the public telecommunications infrastructure.*

demonstrates how the 14 basic NS/EP functional requirements for voice and

voice band data services are met. GETS

also serves as the access mechanism to teleconferencing and dial-up access data services and has a nontraceability option.

Agencies can use the universal NS/EP access number [REDACTED] to provide priority call processing. GETS can be used during incidents of disaster or when a national emergency is declared. Critical users have access to AT&T's GETS network 24x7. For a detailed discussion of GETS (Technical Systems, Administration, and Operation and Management aspects), refer to Section A.1.1, GETS and GETS Nontraceability (NT) in the Functional Requirements Implementation Plan (FRIP), Part A, Appendix A.

*AT&T has shown a high level of reliability and maturity in providing NCS GETS, as highlighted below:*

- *AT&T Labs have supported NS/EP Programs for over 40 years.*
- *During the first two weeks of the "September 11<sup>th</sup>, 2001 crisis," 96% of GETS attempted calls were completed successfully. AT&T's network carried more than 6,000 GETS calls into, out of, and within New York City metropolitan area."*

FUNCTIONAL REQUIREMENT

FUNCTIONAL REQUIREMENT	VS	CPCS	TFS	ACS	VTS	FRS	IPS	NBIP-VPNS	PBIP-VPNS	ATMS	SMEMS	PLS	ETHS	L2VPNS	IPTELS	VoIPTS	CIPS
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Table 1.3.5.a-2: Approach to Satisfy Each NS/EP Basic Functional Requirements for Services. [REDACTED]

LEGEND

REFERENCE SECTION

### 1.3.5.a.1.1 GETS with Non Traceability (NT) Option

Agencies can use the NS/EP voice priority services without risk of usage being traced. AT&T began offering nontraceability in 1986 and continues serving critical users as the only telecommunications vendor that offers NT nontraceability service. Critical Government customers with NS/EP needs require these features to meet mission requirements through this NCS-managed program.

For a detailed discussion of GETS with NT option (technical systems, administration, and operation and management aspects), refer to Sections A.1.1.4, GETS with Nontraceability Option, and A.1.1.5, GETS and NT Management, Operations and Administration of Functional Requirements Implementation Plan (FRIP) Part A, Appendix A.

### 1.3.5.a.2 Wireless Priority Service (WPS)

WPS is an NS/EP Program for priority cellular network access. Through a partnership with Cingular Networks, AT&T offers cellular/personal communications service (CPCS), working hand-in-hand with the AT&T GETS capabilities, to meet all 14 functional requirements.

*Priority access to the telecom infrastructure includes wireless services.*

Following September 11<sup>th</sup>, the White House directed the NCS to field WPS to address the need for cell phone-based priority calling. AT&T was one of the first service providers to support WPS calls in conjunction with GETS for nationwide, full integrated coverage.

AT&T has teamed with Cingular to support NS/EP critical users' needs for priority wireless call processing that is fully integrated with wireline priority treatment for NS/EP services. With WPS, critical users can dial the [REDACTED] [REDACTED] to queue for priority access to the cellular transponder. Access to NS/EP features is obtained by dialing [REDACTED] for priority handling across the



network. For discussion of WPS, refer to Section A.1.2, Wireless Priority Service of Functional Requirements Implementation Plan (FRIP), Part A, Appendix A.

**1.3.5.a.3 Telecommunication Service Priority (TSP)**

TSP is a Federal Communications Commission (FCC)-mandated program. Managed by NCS, it established the legal basis for telecommunication

*Effective emergency response requires prioritized provisioning and restoration of mission-critical telecom services.*

vendors to act on a priority basis in provisioning and restoring services supporting NS/EP mission requirements. Agencies can purchase TSP treatment for any service that is uniquely

identifiable and provided in support of a customer's NS/EP mission and when a customer has obtained a TSP authorization code from the Office of Priority Telecommunications (OPT). Applicable TSP services include: dedicated private lines, access lines, dial tone lines, high-capacity digital systems, and trunks between another carrier's switching or wireless nodes. For discussion of TSP, refer to Section A.1.3, Telecommunication Service Priority of Functional Requirements Implementation Plan (FRIP), Part A in Appendix A.

**1.3.5.a.3.1 TSP Provisioning**

Agency TSP orders are completed on a priority basis [REDACTED]

[REDACTED] A dedicated team at the AT&T Government Solutions Customer Care Center provides enhanced oversight of all TSP orders.

The majority of the TSP provisioning process is [REDACTED]

[REDACTED] enhanced oversight is provided internally and with the service providers from whom access is obtained.

### 1.3.5.a.3.2 TSP Restoration

Service is restored by AT&T's Customer Care staff with TSP restoration priority using the self-healing network in conjunction with processes built into OSSs and special handling.

TSP requirements are supported, and there is full compliance with any future commercially available TSP replacement system. Agencies experience fast and reliable restoration and provisioning of TSP-designated services through automation on the network level and AT&T's Customer Care support.

### 1.3.5.a.4 Next Generation (NG) GETS and NT in VoIP Environment

Agencies benefit from close coordination with the NCS and the Networx Program Management Organization (PMO) in support of emerging technical

*Emerging technology must support the NCS principles and Executive Order 12472.*

standards. These standards are approved by the American National Standards Institute (ANSI) T1, International Telecommunications Union-Telecommunications Standards Sector (ITU-TSS), and 3rd Generation Partnership Project (3GPP) for next generation network that provides the basis future NS/EP enhancements. For further discussion of Next Generation (NG) GETS and NT in the Voice over Internet Protocol (VoIP) Environment (Technical Systems, Administration, and Operation and Management aspects), refer to Section A.1.4, Next Generation GETS and NT in VoIP Environment of Functional Requirements Implementation Plan (FRIP), Part A in Appendix A.

To provide Agencies with VoIP priority services, AT&T is working with NCS to migrate AT&T's GETS onto IP/multiprotocol label switching (MPLS)-based network as well as driving the necessary standards in various bodies. Efforts in the standard arena make it possible to provide IP calls with the necessary priority treatment.



### 1.3.5.a.4.1 VoIP—Platform for the Next Generation of NS/EP Communications Services

VoIP has a potential of delivering a multitude of cost-effective services.

**Figure 1.3.5.a.-1** demonstrates some benefits of migrating to VoIP platforms.

To offer Agencies enhanced telecommunication capabilities and services, AT&T is expanding its VoIP-enabled portfolio with offerings, such as CallVantage consumer service and Managed Services VoIP

Business/Government.

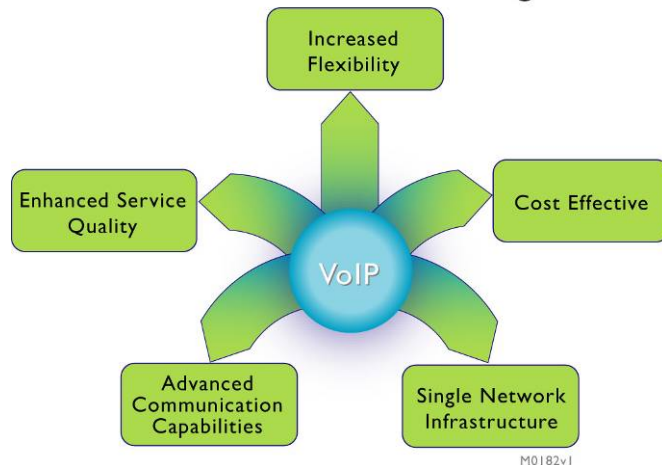
Aggressively moving to

support NS/EP services on VoIP platforms reflects a commitment to delivery of uninterrupted NS/EP services through network evolution. [REDACTED]

[REDACTED]

[REDACTED]

#### Voice over IP Advantages



**Figure 1.3.5.a-1: Voice over IP Advantages.** Agencies experience a multitude of benefits when using VoIP services.

### 1.3.5.a.5 Standards Activities

AT&T works closely with the NCS to ensure that Networkx customers' requirements for NS/EP receive the necessary focus in the telecommunication industry. The AT&T Team strives for Agencies to stay on the cutting edge.

Agencies maintain their ability to interoperate with other networks by successfully fostering innovation and driving necessary standards in various bodies and implementing them within the network.

Agencies need priority treatment of NS/EP services across all IP services. In 2004, in support of the next generation GETS architecture, AT&T systematically began to drive standards efforts toward the stated NS/EP goal, in conjunction with active NCS support and involvement (**Table 1.3.5.a-3**).

ACTIVITY	DESCRIPTION	BENEFITS
Priority classification	Three admission control priority classes in user plane for all IP services are proposed, with the highest class reserved for emergency services, such as NS/EP.	Highest class reserved for NS/EP services
Priority signaling	Mapping between priority classes and signaling message have been proposed, along with definition of emergency domain name spaces and mapping to session initiation protocol (SIP) resource priority header.	NS/EP support for IP services
Priority mechanisms	AT&T has proposed maximum allocation resource (MAR) algorithms for application of DiffServ Traffic Engineering (DS-TE).	NS/EP support for IP services
Reliability activities	Mechanisms to allow additional reliability for IP services that enable alternative routing, computation of diverse paths, fast restoration capabilities, congesting control, and many more.	High quality NS/EP support for IP services

**Table 1.3.5.a-3: AT&T's Standards Activities in 2004.** *We are systematically driving standard efforts toward satisfying NS/EP requirements.*

### 1.3.5.b Approach to Protecting SS7 Signaling Systems [L.34.1.3.5.b]

(b) Describe how the offeror's approach will satisfy the requirements in Section C.5.2.5 for protection of SS7 signaling systems and satellite command links (if employed). [L.34.1.3.5.b]

The telecommunications infrastructure, specifically the signaling infrastructure, must be protected to provide service during emergency situations. As described in **Table 1.3.5.b-1**, the Federal Government is provided with secure and reliable services that rely on the SS7 network.

*To provide telecom services during an emergency situation, the network must be protected.*

PROTECTING SS7 SIGNALING AND SATELLITE COMMAND LINKS	DESCRIPTION
Protecting the SS7	<ul style="list-style-type: none"> <li>Approximately 1/3 of SS7 network is encrypted.</li> <li>Cable plant is buried and physically isolated to minimize unauthorized intrusions.</li> <li>Strict physical diversity standards implemented to maintain SS7 availability.</li> <li>Operational access to SS7 network is tightly controlled; only a limited number of AT&amp;T employees has access.</li> <li>Network access points are screened (only messages with acceptable point codes are allowed to enter the network).</li> </ul>
Satellite Command Link Protection	Encrypt satellite facilities for command and control links.

**Table 1.3.5.b-1: Protecting SS7 Signaling and Satellite Command Links.** *Agencies are provided with secure, reliable services because emergency network is protected by various measures (e.g., encryption and access control).*

### **1.3.5.b.1 Protection of SS7 Signaling System**

The Federal Government benefits from a reliable and secure SS7 network.

AT&T is the only service provider that encrypts SS7 links with approximately a third of our SS7 network already encrypted. Agencies also benefit from physical isolation, physical diversity, message screening, and message throttling.

#### **1.3.5.b.1.1 Physical Isolation**

Physical Isolation is critical to overall protection of SS7 paths. Installing cables in a duct with minimum ground placement depth prevents cable damage, cable cuts, and unauthorized intrusions.

*Signaling is critical to the viability of a telecom network.*

All AT&T cables are installed in ducts of high-density polyethylene (HDPE) inner duct or polyvinyl chloride (PVC) rigid duct. At a minimum, three ducts are installed for all new routes. Additional ducts can be placed for future growth and cable upgrades. When additional protection is required, steel pipes are installed at an additional cost.

#### **1.3.5.b.1.2 Physical Diversity**

Agencies experience added service reliability from network facility route diversity, which minimizes the loss of service caused by major route failures by the availability of alternate routes for disaster recovery. Maintaining and following strict physical diversity standards for global data and voice network are a priority. These standards include, but are not limited to: direct buried cable separation, underground cable separation, regenerator huts, terminal entrances, river crossings, bridge crossings, cable intersections, and aerial cable.

#### **1.3.5.b.1.3 SS7 Message Screening**

Agencies benefit from strong physical and logical control over signaling switches that control the AT&T global network. Best practices for security include the following:

- To offer greater security, only a limited number of employees are granted operational access to the SS7 network.
- All message access control at the interfaces of these access points is monitored for correctness. [REDACTED]

#### **1.3.5.b.1.4 Message Throttling**

Message throttling in the SS7 network is primarily used for congestion control. When a message is routed, a signaling transfer point (STP) examines the routing label and determines a route for the message. In making the decision, the STP consults a routing table, which contains a prioritized list of routes, where a route associates a link set with a destination.

For each route, status is maintained listing the destination as either allowed, restricted, or prohibited. If prohibited, a route cannot be used to carry traffic toward a destination. If restricted, it can be used as a last resort for that priority level. If allowed, no restrictions apply. [REDACTED]

#### **1.3.5.b.1.5 Secure Tunneling**

Tunneling is not used on the SS7 network due to the lack of commercial need. However, AT&T has the capability to implement tunneling, if the need arises. Tunneling provides additional security enhancements, such as authentication and encryption. SS7 paths are continually safeguarded with reliable, effective, and cost-efficient solutions, such as physical isolation, physical diversity, message screening, and message throttling.



**1.3.5.b.2 Protection of Satellite Command Link**

Any satellite channels that carry services listed in Section 5.2.2 use encrypted command and control links so that the service remains under the control of the service provider authority. Other measures are used, when available and economical, to mitigate satellite command-link takeover.

**1.3.5.c National Capital Region Assured Service Network Architecture [L.34.1.3.5.c]**

(c) Describe how the network architecture will satisfy the requirements in Section C.5.2.7 for assured service in the National Capital Region. [L.34.1.3.5.c]

To provide continuity of operations (COOP), a diverse and restorable resilient network is maintained. Critical NS/EP users need services that are robust and sustainable under various types of nonstandard events. Federal Agencies must be able to continue their critical missions without interruptions.

The [REDACTED] primary vehicles for providing voice and data connectivity are listed below:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

*Government will be unable to respond to emergency situations without COOP in the Capital Region.*

The resiliency of these [REDACTED] networks is considered individually and described in greater detail in the Section A.2.2, Network Switch Administration, Operations, and Management of the Functional Requirements Implementation Plan (FRIP), Part B, Appendix A.

[REDACTED]  
[REDACTED] (Table 1.3.5.c-1) [REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED] (listed in

**Table 1.3.5.c-1)** [REDACTED]

[REDACTED]

SWITCH/ROUTER	LOCATION
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

**Table 1.3.5.c-1: Switches** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

### **1.3.5.1 Narrative Text Requirement**

#### **1.3.5.1.1 NS/EP Functional Requirements Implementation Plan (NS/EP FRIP) – Part A [C.5.2.2]**

Part A of the NS/EP FRIP shall include technical systems, administration, management, and operational areas in the contract addressing how the 14 basic functional requirements will be supported for the above services (See Section C.7 for format).

AT&T is providing an NS/EP Functional Requirements Implementation Plan (FRIP). The NS/EP FRIP (Part A) describes the technical systems, administration, management, and operational support for NS/EP services. A detailed description of GETS, WPS, TSP, and NT Nontraceability Service is also part of the FRIP. These services are further linked to the 14 basic functional requirements. Refer to Section 1.3.5.a.1.1 and Technical Volume, Appendix A, for a detailed description of the NS/EP FRIP, Part A.

#### **1.3.5.1.2 NS/EP Functional Requirements Implementation Plan (NS/EP FRIP) – Part B [C.5.2.2]**

If the National Capital Region is covered in the contract, the contractor shall (2) The NS/EP FRIP Part B shall address technical systems and administration, management, and operations requirements for the National Capital Region.

As a part of our proposal submission, AT&T is providing an NS/EP Functional Requirements Implementation Plan (FRIP). NS/EP FRIP, Part B, describes technical systems, administration, management, and operational support for NS/EP services. A detailed description of how services are provided in the National Capital Region is part of NS/EP FRIP, Part B. Refer to Section 1.3.5.c and Technical Volume, Appendix A, for a detailed description of the NS/EP FRIP, Part B.

#### **1.3.5.1.3 NS/EP FRIP – Part B Strategy**

If the National Capital Region is covered in the contract, the contractor shall: 1. Provide Part B of the NS/EP FRIP addressing the strategy for assured service in the National Capital Region

AT&T maintains a diverse, restorable, and resilient network nationwide, with particular attention to these key capabilities in critical areas, such as the National Capital Region. NS/EP users need services that are robust and

sustainable under various types of nonstandard events. Federal Agencies must continue their critical missions without interruptions.

The National Capital Region is supported by at least two switches/routers. The loss of a single switch/router in the National Capital Region will not result in a disruption of more than 15% of total network traffic. AT&T's NS/EP FRIP, Part B, consists of technical systems, administration, operations, and management areas.

Federal Agencies in the National Capital Region are served by 44 switches. These switches offer both capacity and diversity. Agencies inherently use AT&T's network self-healing features; in case of a single switch failure, all the through traffic of the switch is automatically restored.

### ***Dual-Homing Option***

Agencies have a choice, at additional cost, to purchase a dual-homing option, which significantly enhances switch/router node access availability. AT&T offers managed Internet service access redundancy option (MARO) for IP network and split access flexible egress routing (SAFER) for IXC transport network.

MARO optimizes the performance of multiple, dedicated Internet circuits and eliminates single points of failure. MARO provides options for access router redundancy and backbone node redundancy.

SAFER is a 4E-based diversified routing feature with a routing capability that allows multiple egress from the ASN for a given call destination. The SAFER feature also allows traffic to be distributed, by percent, to properly distribute call attempts.



**1.3.5.1.4 National Capital Region Network Switches/Routers**

Because of the high concentration of traffic into and out of the National Capital Region, the contractor shall use at least two geographically separate network switches/routers to serve the National Capital Region and loss of one of these switches/routers shall not result in a loss of more than 15 percent of total network traffic.

AT&T’s resilient network in the National Capital Region consists of 44 landline switches and routers (**Table 1.3.5.1.4-1**) offering Agencies switch capacity and diversity. As a result of the number of diverse switch/router geographic locations, Agency traffic is supported by at least two geographically diverse switches/routers within the National Capital Region. With dual switches/

routers, a loss of a single switch/router in the National Capital Region will not result in a disruption of more than 15% of the total network traffic.

AT&T’s overarching design allows through traffic to be automatically restored if a single switch from **Table 1.3.5.1.4-1** is lost. To correct equipment failures and cable cuts before they affect Agencies’ service,

voice and data networks use self-healing features. These features include FASTAR for the IXC transport network, SONET self-healing rings, and the AT&T intelligent optical network with highly flexible restoration capacity.

AT&T’s network self-healing features instantly identify equipment failures or fiber optic cable cuts and automatically reroute circuits through spare capacity.

SWITCH/ROUTER	LOCATION
DMS 500 Switch (x1)	Washington, D.C.
DMS 500 Switch (x1)	Washington, D.C.
5ESS Edge Switch (x1)	Washington, D.C.
5ESS Edge Switch (x1)	Arlington, VA
4ESS Long Distance Switch (x1)	Washington, D.C.
4ESS Long Distance Switch (x1)	Arlington, VA
Siemens (SMX-2100) (x1)	Washington, D.C.
Backbone Routers (x2)	Washington, D.C.
Peering Routers (x4)	Washington, D.C.
Gigabit Access Routers (x8)	Washington, D.C.
Access Routers (x12)	Washington, D.C.
Remote Access Routers (x3)	Arlington, VA
Remote Access Router (x1)	Silver Spring, MD
Hub Routers (x4)	Washington, D.C.
Hot Spare (x2)	Washington, D.C.
Route Reflector (x1)	Washington, D.C.

**Table 1.3.5.1.4-1: Switches in National Capital Region.**  
*Agencies benefit from the switch capacity and diversity and can continue their critical missions in case of nonstandard events.*

As provided in **Table 1.3.5.1.4-1**, there are two 4ESS vehicles in the National Capital Region. If a single 4ESS switch fails, all the through traffic is automatically restored by rerouting all the backbone traffic around the damaged switch. The only traffic that is not automatically restored is access traffic for customers who have not opted for a dual-homing arrangement.

FAILED SWITCH (4ESS)	NO. OF ACCESS T1 TRUNKS	UNRESTORED TOTAL TRAFFIC (%)
Lucent 4ESS Long Distance Switch (Washington, D.C.)	2595	0.84%
Lucent 4ESS Long Distance Switch (Arlington, VA)	2418	0.78%

**Table 1.3.5.1.4-2: Percentages of Unrestored Traffic in that Failed Switch.** A loss of a single 4ESS switch in the National Capital Region does not result in a disruption of more than 15% of total network traffic.

The impact of losing the access trunks on an individual 4ESS switch can be quantified by determining the percentage of the total 4ESS network's access trunks homed to that switch. AT&T's entire network has a total of 308,257 access message T1s. Using the formula above, **Table 1.3.5.1.4-2** provides the number of access trunks for the switch and the percentage of unrestored network traffic if that switch failed. **Table 1.3.5.1.4-2** clearly demonstrates that the loss of either 4ESS in the National Capitol Region results in far less than 15% of the total network traffic.

**1.3.5.d Section 508 Requirements [L.34.1.3.5.d]**

(d) Describe the offeror's approach for providing the capabilities needed to meet Section 508 provisions for each of the services identified in Sections C.6.4 and C.6.5. [L.34.1.3.5.d]

The AT&T Team fully embraces Networkx implementation of the Section 508 standards and equivalent facilitation. Of the 21 services cited in the RFP for Section 508 compliance, we are bidding 17. These are accessible to the

disabled by providing: (1) a selection of service enabling devices (SEDs) that provide Section 508 compliance, (2) Section 508 compliant presentation of information and acceptance of commands to enable the service, or (3) equivalent facilitation. **Table 1.3.5.d-1** elaborates on the approach to support Section 508 Requirements.

APPROACH TO MEET SECTION 508 PROVISIONS	DESCRIPTION/BENEFITS
Leverage Deployment of SEDs Provide Section 508 compliant service management tools (i.e., AT&T <b>BusinessDirect</b> ® portal) and applications	Select the best available SEDs offering assistive technology to increase productivity and job satisfaction for employees with disabilities. Continuously enhance service management and monitoring tools to meet Section 508 provisions with available assistive technology software. Perform software modification to relevant applications, including the AT&T <b>BusinessDirect</b> portal and other service management applications. Integrating Section 508 capabilities into online service management and monitoring tools provides disabled Agency personnel with equal access to controlling Networkx services.
Inclusion of Subcontractors with Section 508 experience on Contractor Team	Provides Government Agencies with continuous support for Section 508 issues during the life of the contract, including: <ul style="list-style-type: none"> <li>• Provide consulting services to requesting Agency representatives on any Section 508 related issues</li> <li>• Provide Section 508 compliance testing on an individual case basis</li> <li>• Evaluate, select, procure, deliver, install, test, and train users on adaptive and assistive technology products</li> </ul>

**Table 1.3.5.d-1: Approach to Support Section 508 Provisions.** *AT&T's experienced subcontractors, continuous enhancement of online tools, and deployment of assistive technology provide Agencies with comprehensive 508 compliance solutions.*

Relevant applications, including those accessible through the AT&T **BusinessDirect** portal, have undergone Section 508 compliance audits and are on schedule for implementation by contract award, anticipated in April 2006. Our support for the spirit of the law goes beyond the RFP requirements. For example, although not specifically stated in the RFP, we have included relevant billing and service ordering applications within our Section 508 compliance for Networkx.

### 1.3.5.d.1 Understanding the Networkx Section 508 Requirements

Networkx is extremely important in furthering Electronic Information Technology (EIT) accessibility for disabled employees and is a lead issue in the Department of Justice's bi-annual survey for its Section 508

*Accommodation for persons with disabilities is built into our offered Networkx Services.*

compliance report to the President and Congress. Not only are Federal employees communicating internally and externally through Networkx, but also these services are the backbone for accomplishing mission objectives. EIT accessibility for the disabled assists Agencies in meeting their mission objectives by tapping into the skills and abilities of all personnel.

#### **1.3.5.d.2 AT&T's Section 508 Support for Agencies**

*The Agency challenge is to meet the Section 508 requirements, while working with limited budgets and expanding missions.*

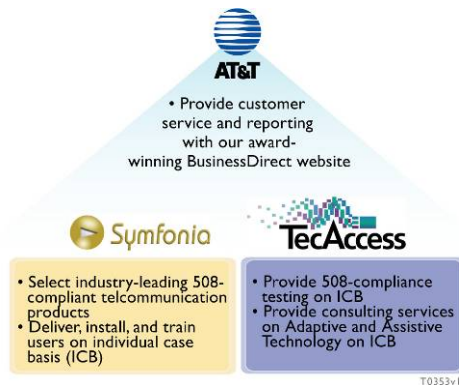
All Agencies face the same challenge of complying with Section 508 requirements, while simultaneously working with limited budgets and expanding missions. To meet this challenge, AT&T assists Agencies in planning and implementing the features that make EIT accessible to disabled employees.

Another hindrance in meeting the Section 508 goals is the need to understand both EIT and disability accessibility issues. For example, many EIT providers believe that persons with disabilities can always access EIT simply by using widely available assistive technology devices, such as screen readers, Braille readers, and voice recognition software. Accessibility can be defeated if the EIT architecture does not accommodate assistive technology. The purpose of the Section 508 standards is to inject accessibility integration into EIT at the design and architectural level. The AT&T Team is committed to help Agencies plan for, comply with, and provide equivalent facilitation of standards.

Meeting the Section 508 requirements and providing for universal accessibility to the Networkx services requires an industry partner who is thoroughly knowledgeable with laws, challenges facing the disabled, and the current and developing state of assistive technology. AT&T teams with one of the leaders in providing the

*Telecommunication and accessibility expertise have been united within the AT&T Team to make Networkx services available to all Federal employees.*

disabled with access to EIT. **Figure 1.3.5.d-1** shows relevant team capabilities and how they work together to deliver Networkx services that are Section 508 compliant and provide equivalent facilitation.



**Figure 1.3.5.d-1: AT&T's 508 Specialty Team Members.** Agencies benefit from the combined experience of the AT&T Team to enhance Section 508 compliance and accommodation of the disabled.

**Symfonia and TecAccess** – Symfonia and TecAccess have formed a team of [REDACTED], bringing together a powerful combination of skill sets and backgrounds. The Symfonia/TecAccess Team is uniquely positioned to focus on the specific needs of telecom service providers and equipment manufacturers in the Government sector.

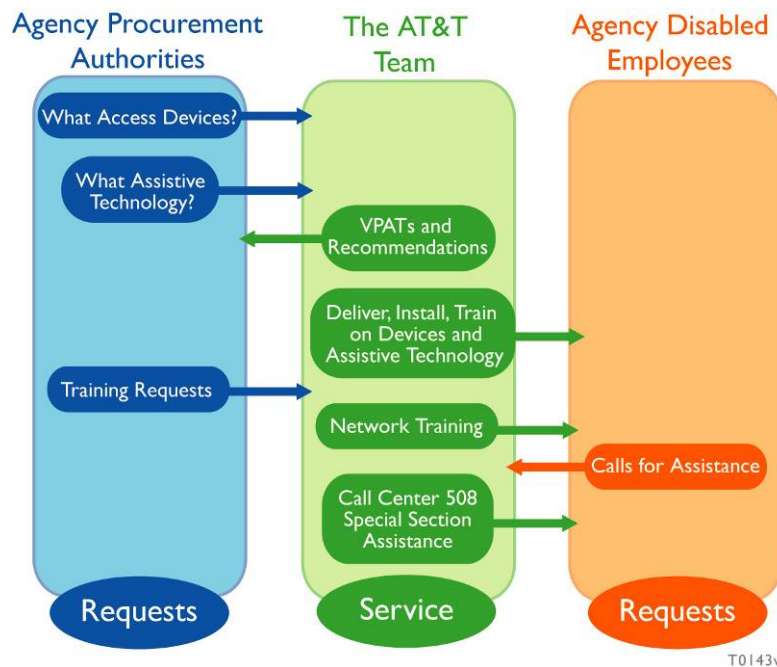
Symfonia is a small, woman-owned company staffed by telecom industry veterans who are experienced in implementing Section 508 solutions with leading service providers, as well as equipment manufacturers (e.g., Alcatel, Lucent Technologies, and Juniper Networks).

TecAccess is a Small Business Administration (SBA) 8a, Small Disadvantaged Business (SDB) certified, and small woman-owned company specializing in EIT accessibility and Section 508/Section 255 compliance solutions. TecAccess is providing Section 508 compliance solutions to Agencies and commercial clients since 1999. Accessibility associates with disabilities constitute 94 percent of the company's workforce. These are the very individuals for whom the Americans with Disabilities Act (ADA) of 1990, Section 508, Section 255, and other accessibility legislation were designed.

They provide TecAccess with the inherent capability to realistically evaluate compliance technology from the perspective of targeted users.

**AT&T and AT&T BusinessDirect** – Many Section 508 compliance requirements are met by incorporating Section 508 compliance into AT&T **BusinessDirect**, our secure website portal and applications. AT&T business customers use this to perform various customer care and network management functions online. A concentrated plan is continually implemented to incorporate Section 508 requirements into relevant AT&T **BusinessDirect** applications by contract award.

**Working Together** – As shown in **Figure 1.3.5.d-2**, the AT&T Team supports Agencies in all aspects of the process of Section 508 compliance. Our Team stands ready to meet the stated RFP requirements and provide many additional Section 508-related services on an individual case basis.



**Figure 1.3.5.d-2: AT&T's All-Inclusive Section 508 Compliance Support.** Agencies receive comprehensive support services for Section 508 issues with AT&T's All-Inclusive Section 508 Compliance Support.

**1.3.5.d.3 Providing Access to Networx Services for Persons with Disabilities**

*Agency personnel with disabilities have full access to the services that execute mission operations.*

AT&T provides the capabilities to meet Section 508 provisions for the 21 services identified in Section C.6.4 (except for those

optional services not offered), as listed in **Table 1.3.5.d-2**. Each submitted VPAT contains information concerning relevant Section 508 standards or equivalent facilitation (refer to VPATs for functional performance criteria).

**Table 1.3.5.d-2** provides a convenient overview of the total number of VPATs submitted in Appendix C. A blank table cell indicates the corresponding VPAT type was not required for this specific service. A letter “V” indicates that the corresponding VPAT was required and is provided in our proposal. For telecommunications products, we have submitted a VPAT for each applicable contract-deliverable SED, as well as additional VPATs, where appropriate.

For CPCS, we have included VPATs for those SEDs bid to meet the technical specifications for SED, sets 41-44. We have also submitted VPATs describing the additional Section 508 compliance features built into the Nokia 6682, which the Government might want to add to any resultant contract at a later date.

NETWORX SERVICE	SUBPART B 1194.21 OS & APPLICATION	SUBPART B 1194.22 WEB	SUBPART B 1194.23 TELECOM	SUBPART C 1194.31 FUNCTIONAL	SUBPART D 1194.41 INFO-DOC
C.2.11.2- Call Center/Customer Contact Center Services (CCS)	V	V	V	V	V
C.2.14.1- Cellular/PCS (CPCS)	V	V	V- Candybar Cell Ph. V- Clamshell Cell Ph. V- PDA-based V- NIC V- 508 Alternates	V	V
C.2.11.12- Collaboration Support Services (CoSS)	Optional Service – Not offered				
C.2.7.11- Converged IP Services (CIPS)	V	V	(Same as IPTeIS)	V	V
C.2.7.10- IP Telephony Services (IPTeIS)	V	V	V- Cisco 7905G V- Cisco 7960G V- Polycom 301 V- Polycom 600	V	V (2) Polycom XTEN





C.2.10.6- Managed E-Authentication Services (MEAS)	V	V	N/A	V	V
C.2.14.3- Multimode Wireless LAN Service (MWLANs)	V	N/A	N/A	V	V
C.2.14.5- Paging (PagS)	Optional Service – Not offered				
1.2.12.1- TeleWorking Services (TWS)	V	V	V	V	V
C.2.11.11- Unified Messaging Services (UMS)	V	V	V	V	V
C.2.8.3- Web Conferencing Service (WCS)	V	V	N/A	V	V
C.2.10.5- Incident Response Service (INRS)	N/A	V	N/A	V	V
C.2.4.5- Internet Facsimile Service (IFS)	Optional Service – Not offered				
C.2.7.9- IP Video Transport Services (IVTS)	Optional Service – Not offered				
C.2.7.4- Managed Tiered Security Services (MTSS)	N/A	V	N/A	V	V
C.2.10.8- Secure Managed Email Service (SMES)	N/A	V	N/A	V	V
C.2.7.8- VOIP Transport Service (VOIPTS)	N/A	V	V	V	V
C.2.14.6- Land Mobile Radio Service (LMRS)	N/A	N/A	V	V	V
C.2.2.1- Voice Services (VS)	N/A	N/A	V	V	V
C.2.2.3- Toll-Free Service	N/A	N/A	V	V	V
C.2.6.1- Combined Services	N/A	N/A	V	V	V

**Table 1.3.5.d-2: Section 508 Compliance for Designated Networx Services.** *The AT&T Team opens up Networx to persons with disabilities.*

### 1.3.5.d.3.1 Voluntary Product Accessibility Templates

In 2001, the Information Technology Industry Council (ITIC) partnered with the GSA to create the VPAT. This is an Internet-based

*Our VPATs are designed to accurately assist and guide procurement officials in obtaining 508-compliant products.*

tool designed to assist Federal contracting and procurement officials in fulfilling the market research requirements in the Section 508 implementation regulations. As explained by the ITIC, the VPAT is considered to be a self-representation; suggested language is presented to simplify market research by procurement officials or other customers.

We followed the suggested language, as well as the other information and guidance provided by the ITIC. For example, to help inform Agencies of the applicability of particular provisions of the standards to a product or service being offered, we used the suggested notation “Not Applicable” with an



explanation in the “Remarks” column. We submitted additional VPATs that are be useful. VPATs required by Section C.6.4 are provided in Appendix C.

**1.3.5.d.3.2 Functional Performance (Subpart C, Paragraph 1194.31)**

**Table 1.3.5.d-3** addresses each of the 21 services cited in Section C.6.4 and explains how we meet each of the relevant provisions of Subpart C, Functional Performance Criteria, Paragraph 1194.31, for each offered service.

**CALL CENTER/CUSTOMER CONTACT CENTER SERVICES (CCS)**

- |  |   |  |
|--|---|--|
| <p><b>Section 1194.31(a)</b> – Blind persons can access the Call Center and its features using only voice communication.</p> <ul style="list-style-type: none"> <li>• Access for routing control is provided for blind persons by supporting assistive technology.</li> </ul>                        | <p><b>Section 1194.31(b)</b> – Visually impaired persons can access the Call Center and its features using only voice communication.</p> <ul style="list-style-type: none"> <li>• Access for routing control is provided for persons with impaired vision by supporting assistive technology.</li> </ul>            | <p><b>Section 1194.31(c)</b> – Deaf persons can access the Call Center and its features using their TTY to call directly into a TTY located in the Call Center.</p> <ul style="list-style-type: none"> <li>• User hearing is not required for access to routing control.</li> </ul>  |
| <p><b>Section 1194.31(d)</b> – Persons with impaired hearing can access the Call Center and its features using their TTY to call directly into a TTY located in the Call Center.</p> <ul style="list-style-type: none"> <li>• User hearing is not required for access to routing control.</li> </ul> | <p><b>Section 1194.31(e)</b> – Persons with impaired or no speech capability can access the Call Center and its features using their TTY to call directly into a TTY located in the Call Center.</p> <ul style="list-style-type: none"> <li>• User speech is not required for access to routing control.</li> </ul> | <p><b>Section 1194.31(f)</b> – Persons with limited reach, strength, or motor control can access the Call Center and its features using only voice communication.</p> <ul style="list-style-type: none"> <li>• Access to routing control for those of limited mobility and strength is provided through support for assistive technology.</li> </ul> |

**CELLULAR/PCS (CPCS)**

- |   |   |   |
|---|---|---|
| <p><b>Section 1194.31(a)</b> – Cellular/personal communication service can be accessed by tactile key input and voice-activated dialing features that do not require vision.</p> <ul style="list-style-type: none"> <li>• Several features (e.g., key press depression feedback, audible low battery and volume indicators, distinct tones for power on and off) are included.</li> <li>• For access to information technologies, menus and status indication, the Nokia 6682 with TALKS software (at no additional charge for employees with verified disabilities) can be used. This combination provides access to menus, status indicators, such as network and battery levels, email, SMS, MMS, web access, and other supported services.</li> <li>• TALKS by Cingular Wireless provides a wide range of settings to enhance accessibility. It provides full access to contact lists and software that enables synchronization with MS Outlook. It has been tested with JAWS.</li> </ul> | <p><b>Section 1194.31(b)</b> – Cellular/personal communication service can be accessed by tactile key input and voice-activated dialing that do not require visual acuity greater than 20/70.</p> <ul style="list-style-type: none"> <li>• Zoom text and enlarged fonts are offered.</li> <li>• Terminal devices are also offered that provide enlarged text displays and audio output is available with TALKS by Cingular Wireless.</li> </ul> | <p><b>Section 1194.31(c)</b> – Deaf persons can access and use the wireless service through short messaging service and instant messaging, and email features.</p> <ul style="list-style-type: none"> <li>• Several handsets are TTY compatible. Menu options are listed visually.</li> </ul> |
| <p><b>Section 1194.31(d)</b> – Enhanced auditory is provided by speakerphone as well as user-</p>   | <p><b>Section 1194.31(e)</b> – Persons without speech capability can</p>  | <p><b>Section 1194.31(f)</b> – Access is provided through features:</p>   |

selected ring tones and alerts over various frequencies.

- Also supported are T-coil compatible neck loops with Nokia handsets, HATIS, Sound Wizard, etc.

access and use the wireless service through short messaging service, instant messaging, and email features.

- Speakerphones work with some augmentative communication devices, but might not be effective with loud respirators.

automatic or any key answer, voice dialing.

- A flat back for tabletop operation, speakerphone, and Voice Connect service are also provided.
- Setting single-digit dialing with Voice Connect set on one or more keys can be combined with a mechanical switch.

#### COLLABORATION SUPPORT SERVICES (COSS)

##### CONVERGED IP SERVICES (CIPS)

**Section 1194.31(a)** – Voice is offered as an alternative to text chat.

**Section 1194.31(b)** – The CoSS service provides the capability for enlarged print output.

**Section 1194.31(c)** – CoSS service is a Text-based service and does not require user hearing.

**Section 1194.31(d)** – CoSS service allows users to use voice and text messaging functionality at the same time, so users who cannot rely on hearing can communicate through text responses.

**Section 1194.31(e)** – CoSS service allows users to use voice and text messaging functionality at the same time, so users who cannot rely on hearing can communicate through text responses.

**Section 1194.31(f)** – CoSS service interface does not require fine motor skills to operate the service.

##### IP TELEPHONY SERVICES (IPTELS)

**Section 1194.31(a)** – Blind persons can access the service using tactile navigation offered on our IP phones, including caller ID.

- The Cisco 7900 Series, for example, offers these features described in VPAT sections that address Paragraphs 1194.23 (e) and 1194.23(k)(1)(4).

**Section 1194.31(b)** – At normal working distances, visual acuity greater than 20/70 is not required for use of our offered IP phones.

- Alpha-numeric displays on Cisco 7900 Series IP Phones conform to ADA accessibility design guidelines.

**Section 1194.311** – We support TTY by providing a G711 gateway.

- Our offered Cisco 7900 Series IP Phones support TTY operation, as detailed in the VPAT Sections that address paragraphs 1194.23(a), 1194.23(b), and 1194.23(j).

**Section 1194.31(d)** – Our offered Cisco 7900 Series IP Phone contains features that provide enhanced audio. These are described in the VPAT sections that address paragraphs 1194.23(f) and 1194.23(g).

- Support for assistive hearing devices is described in the sections that address Paragraphs 1194.23(h) and 1194.23(i).
- All 7900 Series IP Phones provide a visual indication of incoming calls and permit the volume of the ringer to be adjusted.

**Section 1194.31(e)** – The TTY can be connected to the IP telephony service through Cisco Analog Telephone Adapter ATA 186 or ATA 188 and the RJ-11 analog FXS ports.

**Section 1194.31(f)** – The operational characteristics of all controls on Cisco 7900 Series IP Phones conform to Paragraph 1194.23(k)(2).

- No simultaneous actions (e.g., pressing two buttons at the same time) are required.



## MANAGED E-AUTHENTICATION SERVICES (MEAS)

### Section 1194.31(a)

- Mode of operation for blind person to read token: Instead of a hard token, which is delivered as a 6-digit readout on an external device, a person without vision can be given permanent password access. This practice is already used within AT&T to grant equivalent access to this service for persons without vision.
- Mode of operation for blind person to access the service: Access for blind persons is through the AT&T Global Network Client, which runs under Windows XP and 2000 and supports assistive technology.
- Mode of operation for blind person to perform management functions: Access is through the e-access website.

**Section 1194.31(d)** – Audio information is not important for using the service.

### Section 1194.31(b)

- Mode of operation for visually impaired person to read token: A magnification device can be placed in front of the 6-digit readout on the external device, and the authentication process can proceed.
- Mode of operation for visually impaired person to access the service: Access is through the AT&T Global Network Client which runs under Windows XP and 2000 and supports assistive technology.
- Mode of operation for visually impaired person to perform management functions: Through e-access web page using assistive technology or the Windows Magnifier.

**Section 1194.31(e)** – Using the hard token or accessing the service does not require speech.

### Section 1194.31(c)

– Using the hard token or accessing the service does not require hearing.

### Section 1194.31(f)

– Using the hard token or accessing the service does not require fine motor control or simultaneous actions. It is also accessible to those with limited reach or strength.

## MULTIMODE WIRELESS LAN SERVICE (MWLAN)

**Section 1194.31(a)** – Access for blind persons is through the AT&T Global Network Client, which runs under Windows XP and 2000 and fully supports assistive technology.

**Section 1194.31(d)** – Audio information is not important for using the service.

**Section 1194.31(b)** – Visually impaired persons can use the Windows Magnifier and utilities to work with the Global Network Client.

**Section 1194.31(e)** – Accessing or using the service does not require speech.

**Section 1194.31(c)** – Accessing or using the MWLAN service does not require hearing.

**Section 1194.31(f)** – Operation is also by tab key and by single strokes. Therefore, cursor not required. Also, Windows provides sticky key function for simultaneous operations.

## PAGING (PAGS) – OPTIONAL SERVICE, NOT OFFERED

### TELEWORKING SOLUTIONS (TWS)

**Section 1194.31(a)** – (Same as for IPTeS, VS, and MEAS)

**Section 1194.31(d)** – (Same as for IPTeS, VS, and MEAS)

**Section 1194.31(b)** – (Same as for IPTeS, VS, and MEAS)

**Section 1194.31(e)** – (Same as for IPTeS, VS, and MEAS)

**Section 1194.31(c)** – (Same as for IPTeS, VS, and MEAS)

**Section 1194.31(f)** – (Same as for IPTeS, VS, and MEAS)

**Section 1194.31(a)** – Access is through AnyPath, which supports TUI audio-only interface for end user subscribers of messaging services.

**Section 1194.31(d)** – AnyPath supports adjustable gains in increments of 3 dB up to a maximum of 15 dB of gain.

**Section 1194.31(a)** – Access is provided for blind persons by supporting assistive technology.

**Section 1194.31(d)** – User hearing is not required to access the service. Participation by persons of limited hearing is supported by supporting assistive technology.

**Section 1194.31(a)** – Access is provided for blind persons by supporting assistive technology.

**Section 1194.31(d)** – Audio information is not important for access to the service.

#### UNIFIED MESSAGING SERVICES (UMS)

**Section 1194.31(b)** – AnyPath supports audible information retrieval but does not support enlarged print or display output.

- Windows Magnifier can be used.

**Section 1194.31(e)** – AnyPath supports text messaging and email through web and WAP clients, as well as standard email clients, such as Microsoft Outlook, without requiring user speech.

#### WEB CONFERENCING SERVICE (WCS)

**Section 1194.31(b)** – Access for visually impaired is provided by supporting assistive technology.

**Section 1194.31(e)** – User speech is not required to access the service.

#### INCIDENT RESPONSE SERVICE (INRS)

**Section 1194.31(b)** – Access for visually impaired persons is provided by supporting assistive technology.

**Section 1194.31(e)** – User speech is not required to access the service.

**Section 1194.31(c)** – Access for deaf persons is provided by AnyPath operation through a graphical web browser interface.

- Message retrieval is through web and wireless application protocol (WAP) clients, as well as standard email clients (e.g., Microsoft Outlook for text and non-audio messages).

**Section 1194.31(f)** – AnyPath user interface does not require fine motor control or any simultaneous actions and is operable with limited reach and strength.

**Section 1194.31(c)** – User hearing is not required to access the service. Participation by deaf persons is supported by supporting assistive technology.

**Section 1194.31(f)** – Access for those of limited mobility and strength is provided through support for assistive technology.

**Section 1194.31(c)** – User hearing is not required to access the service.

**Section 1194.31(f)** – Access for those of limited mobility and strength is provided through support for assistive technology.

#### INTERNET FACSIMILE SERVICE (IFS) – OPTIONAL SERVICE, NOT OFFERED

#### IP VIDEO TRANSPORT SERVICES (IVTS) – OPTIONAL SERVICE, NOT OFFERED

#### MANAGED TIERED SECURITY SERVICES (MTSS)

**Section 1194.31(a)** – Access is provided for blind persons by supporting assistive technology.

**Section 1194.31(d)** – Audio information is not important for access to the service.

**Section 1194.31(b)** – Access for visually impaired is provided by supporting assistive technology.

**Section 1194.31(e)** – User speech is not required to access the service.

**Section 1194.31(c)** – User hearing is not required to access the service.

**Section 1194.31(f)** – Access for those of limited mobility and strength is provided through support for assistive technology.

#### SECURE MANAGED EMAIL SERVICE (SMES)

**Section 1194.31(a)** – Access is provided for blind persons by supporting assistive technology.

**Section 1194.31(d)** – Audio information is not important for access to the service.

**Section 1194.31(b)** – Access for visually impaired is provided by supporting assistive technology.

**Section 1194.31(e)** – User speech is not required to access the service.

**Section 1194.31(c)** – User hearing is not required to access the service.

**Section 1194.31(f)** – Access for those of limited mobility and strength is provided through support for assistive technology.



**Section 1194.31(a)** – Access to the secure website is provided for blind persons by supporting assistive technology.  
**Section 1194.31(d)** – Audio information is not important for access to the secure website.

#### VOIP TRANSPORT SERVICE (VOIPTS)

**Section 1194.31(b)** – Access to the secure web site is provided for persons with limited vision by supporting assistive technology.  
**Section 1194.31(e)** – User speech is not required to access the secure website.

**Section 1194.31(c)** – User hearing is not required for access to the secure website.

**Section 1194.31(f)** – Access to the secure website for those of limited mobility and strength is provided through support for assistive technology.

**Section 1194.31(a)** – Product/ Service does not exist but is to be developed in response to Agency requirements. Supported as required after the design and engineering phase.  
**Section 1194.31(d)** – Product/ Service does not exist but is to be developed in response to Agency requirements. Supported as required after the design and engineering phase.

#### LAND MOBILE RADIO SERVICE (LMRS)

**Section 1194.31(b)** – Product/ Service does not exist but is to be developed in response to Agency requirements. Supported as required after the design and engineering phase.  
**Section 1194.31(e)** – Product/ Service does not exist but is to be developed in response to Agency requirements. Supported as required after the design and engineering phase.

**Section 1194.31(c)** – Product/ Service does not exist but is to be developed in response to Agency requirements. Supported as required after the design and engineering phase.  
**Section 1194.31(f)** – Not Applicable – Fundamental Alteration Exception Applies.

**Section 1194.31(a)** – Voice service is by default accessed by audio by user telephone interfaces that do not require vision. Speech recognition is also provided, providing verbal navigation through the menus.

#### VOICE SERVICES (VS)

**Section 1194.31(b)** – Voice service is by default accessed by audio by user telephone interfaces that do not require vision. Speech recognition is also provided, providing verbal navigation through the menus.

**Section 1194.31(c)** –Voice service supports industry standard codec G.711 and can record TTY tones for prompts. TTY users can respond to the Call Prompter and Interactive Voice Response services by using DTMF tones or speech recognition.  
**Section 1194.31(f)** – Supported. The voice service accepts both DTMF and voice input. Menus can, therefore, be navigated verbally.

**Section 1194.31(d)** – Not Applicable – This is intended for the end-user device and not for the voice service. Also, FCC Part 68 (TIA 968) prohibits end user adjustable gain across a public telephone network call.

**Section 1194.31(e)** – Supported. The voice service accepts dual tone multifrequency (DTMF) input.

#### TOLL FREE SERVICE (TFS)

**Section 1194.31(a)** –Toll-Free Service is by default accessed by audio with user telephone interfaces that do not require vision. Speech recognition provides verbal navigation through the menus.

**Section 1194.31(b)** –Toll-Free Service is by default accessed by audio with user telephone interfaces that do not require vision. Speech recognition provides verbal navigation through the menus.

**Section 1194.31(c)** –Toll-Free Service supports industry standard codec G.711 and can record TTY tones for prompts. TTY users can respond to the Call Prompter and Interactive Voice Response services with DTMF tones or speech recognition.

**Section 1194.31(d)** – Not Applicable. This is intended for the end user device and not for the Toll-Free Service. Also, FCC Part 68 (TIA 968) prohibits end user adjustable gain across a public telephone network call.

**Section 1194.31(e)** –Toll-Free Service accepts DTMF input.

**Section 1194.31(f)** –Toll-Free Service accepts both DTMF and voice input. Menus can, therefore, be navigated verbally.

#### COMBINED SERVICES (CS)

**Section 1194.31(a)** – (Same as for

**Section 1194.31(b)** – (Same as for

**Section 1194.31(c)** – (Same as for

VS, TFS, CPCS)

**Section 1194.31(d)** – (Same as for  
VS, TFS, CPCS)

VS, TFS, CPCS)

**Section 1194.31(e)** – (Same as for  
VS, TFS, CPCS)

VS, TFS, CPCS)

**Section 1194.31(f)** – (Same as for  
VS, TFS, CPCS)**Table 1.3.5.d-3: Accessibility per Service.** *All relevant services are accessible to disabled personnel.*

#### **1.3.5.d.4 Section 508 Compliant Reporting**

In compliance with the Section 508 provisions, the AT&T Team has audited all existing and relevant reporting applications under development for Section 508 compliances. Relevant applications are either compliant with the Section 508 standards or are being modified to include compliance. Relevant billing and service ordering applications are also in the process of being modified to meet the standards. All reports identified in Sections C.3.2 through C.3.9 and C.7 are delivered in a format that meets the relevant Section 508 standards or provides equivalent facilitation.

#### **1.3.5.d.5 Section 508 Compliant Training**

In order to supply information and training that is compliant with the requirements in Section 508, multiple approaches are used that include different methodologies to provide assistance to disabled workers, such as signers and Braille products. Training methodologies and instructional materials are developed and tested through partner companies that specialize in Section 508 compliance and assistive technologies. AT&T instructors are also trained by these partners in the instructional methods best

suited to disabled workers. **Table 1.3.5.d.5-4**, below, outlines the basic approach to assistive training and materials.

TRAINING METHOD	ASSISTIVE OPTIONS/ACCESSIBILITY
Instructor Led or One-On-One Training	<ul style="list-style-type: none"> <li>• Instruction Style is developed to cooperate with assistive methods</li> <li>• Signers are made available as needed</li> <li>• One on one instructors are trained in assistive needs</li> </ul>
Web Training and Materials	<ul style="list-style-type: none"> <li>• Hand out materials in multiple accessible formats as required</li> <li>• Web server systems that support Section 508 assistive accessibility are used</li> <li>• Worker's desktop assistive technologies are supported</li> </ul>
CD-ROM	<ul style="list-style-type: none"> <li>• Downloads such as PowerPoint presentations are tested as accessible</li> <li>• CD-ROM based materials are developed and tested as working with PC based assistive technologies such as screen magnifiers and TTS products</li> </ul>
Hard Copy	<ul style="list-style-type: none"> <li>• All CD-ROM materials are provided as Section 508 Accessible</li> <li>• Hard copy is available in multiple formats such as Braille and large print</li> </ul>
DVD/Video	<ul style="list-style-type: none"> <li>• Hard copy is an option for CD-ROM and Web based material</li> <li>• Video presentations with assistive elements are possible if required by an Agency</li> <li>• Section 508 compliant video productions include audio/data track and are NTSC compliant for viewing on a standard television</li> </ul>

**Table 1.3.5.d.5-4: Section 508 compliance is supported through accessibility.** *Training and other informational materials are provided in multiple formats that are accessible to workers with disabilities.*

To support the Government's workers with assistive needs, all training and instructional materials are developed and tested to the Section 508 accessibility standards. The materials and web accessible information will interoperate with assistive technology or cooperate with instruction methods as required.