Apple Accessibility Conformance Report Based on Voluntary Product Accessibility Template® (VPAT®)

Name of Product: iPhone 16 Pro Max

Product Description: A personal mobile device with a 6.9-inch screen running the iOS 18 operating system.

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Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criteria without known defects or meets with equivalent facilitation.
- **Supports with Exceptions**: Some functionality of the product does not meet the criteria.
- **Does Not Support**: Majority of functionality of the product does not meet the criteria.
- **Not Applicable**: The criteria are not relevant to the product.
- **Not Evaluated**: The product has not been evaluated against the criteria. This can be used only with WCAG 2.0 Level AAA.

WCAG 2.0 Report -

Table 1: Conformance Criteria, Level A -

Refer to iOS 18 VPAT

Table 2: Conformance Criteria, Level AA -

Refer to iOS 18 VPAT

2024 Section 508 Report -

Chapter 3: Functional Performance Criteria -

Remarks and Explanations
iOS includes a built-in screen reader called VoiceOver for users who are blind or have low vision and includes accessible applications and utilities. VoiceOver offers deep customization for user needs, including gesture input, Siri integration, and support of many Bluetooth Braille displays. Applications built using the iOS Human Interface Guidelines and the iOS Accessibility APIs will work with VoiceOver. Information about iOS vision features is available at: https://www.apple.com/accessibility/vision/

Criteria	Conformance Level	Remarks and Explanations
302.2 With Limited Vision. Where a visual mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited vision.	Supports	iOS includes multiple accommodation features so users can better see and hear what's on their screen: Zoom, Dynamic Type, Speak Screen, and Magnifier with Detection Mode.
		Information about iOS vision features is available at: <u>https://www.apple.com/accessibility/vision/</u>

Criteria	Conformance Level	Remarks and Explanations
302.3 Without Perception of Color. Where a visual mode of operation is provided, ICT shall provide at least one visual mode of operation that does not require user perception of color.	Supports with exceptions	 iOS uses color to convey information. In many cases, when color is used, it provides an alternative information display that does not rely on color. While color indicates each control's function, each control also has a unique symbol and position that indicates its function without relying on color information. But, there are some visual elements that do not include an alternative information display. iOS also provides system-level control of display characteristics that cannot be overridden by applications, including options to: Switch the display from color to grayscale. Invert light and dark colors displayed on the screen. Differentiate certain elements on the screen. Reduce the transparency of elements on the screen. All of these features are accessed through Settings for Accessibility and can be used together in different combinations to suit the user's needs.

Criteria	Conformance Level	Remarks and Explanations
302.4 Without Hearing. Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that does not require user hearing.	Supports	Audio is not required for operation of iOS, however, iOS supports video playback of closed caption content and subtitles (when available). iOS includes many features to assist users without hearing, including but not limited to: Live Captions, Sound Recognition, Notifications, Siri, and Braille support. Information about iOS hearing features is available at: <u>https://www.apple.com/accessibility/hearing/</u>

Criteria Co	onformance Level	Remarks and Explanations
302.5 With Limited Hearing. Where an audible mode of operation is provided, ICT shall provide at least one mode of operation that enables users to make use of limited hearing.	upports with exceptions	Audio is not required for operation of iOS, however, iOS supports video playback of closed caption content and subtitles (when available). iOS also includes features to assist those with limited hearing: Mono Audio, Sound output, Live Listen, Headphone Accommodations, Live Captions, and Sound Recognition. Information about iOS hearing features is available at: https://www.apple.com/accessibility/hearing/

Criteria	Conformance Level	Remarks and Explanations
302.6 Without Speech. Where speech is used for input, control, or operation, ICT shall provide at least one mode of operation that does not require user speech.	Supports	Where speech may be required for input, control, or operation, iOS includes the following Accessibility features: Personal Voice, Live Speech, Type to Siri, Vocal Shortcuts, and FaceTime. <i>New for iOS18:</i> Vocal Shortcuts helps users with moderate to severe atypical speech trigger actions in iOS. Users can drive voice interactions by creating custom utterances that Siri can understand, such as setting a timer, taking a screenshot, scrolling up and down, and checking the weather forecast. Information about iOS speech features is available at: <u>https://www.apple.com/accessibility/speech/</u>

Criteria	Conformance Level	Remarks and Explanations
Criteria 302.7 With Limited Manipulation. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that does not require fine motor control or simultaneous manual operations.	Conformance Level Supports	Remarks and Explanations iOS includes Accessibility features to assist users who do not have fine motor control and can't perform simultaneous actions easily: Voice Control, Switch Control, AssistiveTouch, Eye Tracking, Touch Accommodations, Back Tap, Dictation, Sticky and Slow Keys, and more custom keyboard settings. New for iOS18: Eye Tracking gives users a built-in option for navigating iOS with just their eyes, including dwell control to tap. Eye Tracking leverages the front facing camera and can be used with other features such as AssistiveTouch and Voice Control. Information about iOS mobility features is available at: https://www.apple.com/accessibility/mobility/

Criteria	Conformance Level	Remarks and Explanations
302.8 With Limited Reach and Strength. Where a manual mode of operation is provided, ICT shall provide at least one mode of operation that is operable with limited reach and limited strength.	Supports	iOS includes Accessibility features to assist users with limited reach and strength: Voice Control, Switch Control, AssistiveTouch, Eye Tracking, Touch Accommodations, Back Tap, Dictation, and Siri. <i>New for iOS18:</i> Eye Tracking gives users a built-in option for navigating iOS with just their eyes, including dwell control to tap. Eye Tracking leverages the front facing camera and can be used with other features such as AssistiveTouch and Voice Control. Information about iOS mobility features is available at: <u>https://www.apple.com/accessibility/mobility/</u>

Criteria	Conformance Level	Remarks and Explanations
302.9 With Limited Language, Cognitive, and Learning Abilities. ICT shall provide features making its use by individuals with limited cognitive, language, and learning abilities simpler and easier.	Supports	iOS includes Accessibility features to assist users with limited cognitive, language, and learning abilities: Assistive Access, Personal Voice, Live Speech, Guided Access, Siri, Speak Screen, Speak Selection, Dictionary, Live Captions, and Apple Intelligence. <i>New for iOS18:</i> Apple Intelligence can support people with cognitive challenges including: Writing Tools, Priority Messages and Notifications, Reduce Interruptions, Summaries, and Smart Reply. Apple Intelligence will be available in beta on compatible devices, with Siri and device language set to U.S. English, as an iOS 18 update this fall. Some features and additional languages will be coming over the course of the next year. Information about Apple Intelligence is available at: <u>https://www.apple.com/apple-intelligence/</u> Information about iOS cognitive features is available at: <u>https://www.apple.com/accessibility/cognitive/</u>

Chapter 4: Hardware -

Criteria	Conformance Level	Remarks and Explanations
402 Closed Functionality		
402.1 General		

Criteria	Conformance Level	Remarks and Explanations
402.2 Speech-Output Enabled		
402.2.1 Information Displayed On-Screen. Speech output shall be provided for all information displayed on-screen.	Supports	iPhone includes a screen reader called VoiceOver that enables the iPhone to be used without seeing the screen. VoiceOver is now available in over 60 languages and locales, and Voice Control is available in over 10 languages and locales.
402.2.2 Transactional Outputs. Where transactional outputs are provided, the speech output shall audibly provide all information necessary to verify a transaction.	Supports	Recent transactions via Apple Pay are kept in the Wallet app, which supports the VoiceOver function.
402.2.3 Speech Delivery Type and Coordination. Speech output 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. Speech output shall be coordinated with information displayed on the screen.	Supports	 Speech is delivered via the following options: 1) The speakers in the device 2) Headphones can be connected to the the iPhone via a USB-C to 3.5mm Headphone Jack Adapter (available separately), or over standard bluetooth protocols. 3) One of 70 models of supported Braille displays when VoiceOver is on VoiceOver is now available in over 60 languages and locales
402.2.4 User Control. Speech output for any single function shall be automatically interrupted when a transaction is selected. Speech output shall be capable of being repeated and paused.	Supports	VoiceOver supports audio ducking to allow screen reader information to interrupt other audio. Gestures are available to repeat and pause speech.
402.2.5 Braille Instructions. Where speech output is required by 402.2, braille instructions for initiating the speech mode of operation shall be provided. Braille shall be contracted and shall conform to 36 CFR part 1191, Appendix D, Section 703.3.1.	Supports	iPhone supports more than 70 Bluetooth wireless braille displays and braille tables for more than 25 international languages. Some braille displays provide input buttons that can be used in addition to iPhone's on screen controls.
402.3 Volume		

Criteria	Conformance Level	Remarks and Explanations
402.3.1 Private Listening. Where ICT provides private listening, it shall provide a mode of operation for controlling the volume. Where ICT delivers output by an audio transducer typically held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.	Supports	 iPhone volume can be controlled via physical buttons on the device or through onscreen controls. iPhone is rated under the Federal Communication Commission hearing aid compatibility guidelines as follows: M3, T4. iPhone is compatible with ear loop devices, Bluetoothenabled hearing aid solutions, and Made for iPhone hearing aids. Any of these wired devices with a 3.5mm headphone jack can connect to the iPhone via a USB-C to 3.5mm Headphone Jack Adapter, which ships separately. For more information about iPhones and hearing aid compatibility, see www.apple.com/support/hac
402.3.2 Non-private Listening. Where ICT provides non-private listening, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. A function shall be provided to automatically reset the volume to the default level after every use.	Not applicable	Not applicable
402.4 Characters on Display Screens. At least one mode of characters displayed on the screen shall be in a sans serif font. Where ICT does not provide a screen enlargement feature, 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.	Supports	Standard iPhone font is Sans Serif.

Criteria	Conformance Level	Remarks and Explanations
402.5 Characters on Variable Message Signs. Characters on variable message signs shall conform to section 703.7 Variable Message Signs of ICC A117.1-2009 (incorporated by reference, see 702.6.1).	Not applicable	Not applicable
403 Biometrics		
403.1 General. Where provided, biometrics shall not be the only means for user identification or control.	Supports	A user may alternatively enter a passcode to unlock the iPhone. This passcode can also be disabled. Apple Pay which is offered in select countries can be used by entering a passcode.
404 Preservation of Information Provided for Accessibility		
404.1 General. ICT that transmits or converts information or communication shall not remove non- proprietary information provided for accessibility or shall restore it upon delivery.	Supports	Accessibility structure, markup, and descriptions are preserved when converting documents, spreadsheets, presentations, and images into different formats.
405 Privacy		
405.1 General. The same degree of privacy of input and output shall be provided to all individuals. When speech output required by 402.2 is enabled, the screen shall not blank automatically.	Supports	By default, visual input remains on screen during use of VoiceOver. VoiceOver also includes a screen curtain feature for additional privacy for screen reader users.
406 Standard Connections		
406.1 General. Where data connections used for input and output are provided, at least one of each type of connection shall conform to industry standard non-proprietary formats.	Supports	iPhone supports wireless industry standards for the transmission of voice and data, including UMTS/HSPA+/ DC-HSDPA, GSM/EDGE, LTE, 5G (sub-6 GHz and mmWave), Bluetooth 5.3, and 802.11 a/b/g/n/ac/ax Wi- Fi.
407 Operable Parts		

Criteria	Conformance Level	Remarks and Explanations
407.2 Contrast. Where provided, keys and controls shall contrast visually from background surfaces. Characters and symbols shall contrast visually from background surfaces with either light characters or symbols on a dark background or dark characters or symbols on a light background.	Supports	iPhone provides adjustable brightness, as well as settings to invert colors onscreen (white on black) for a higher contrast. You can also choose to reduce transparency and darken colors.
407.3 Input Controls		
407.3.1 Tactilely Discernible. Input controls shall be operable by touch and tactilely discernible without activation.	Supports	 The Side button, Volume buttons, Action button and Camera Control are tactilely discernible. iPhone can also be operated by an external Bluetooth wireless keyboard or external switch software (both available separately). Using the iPhone touchscreen requires the use of a bare finger or conductive device.
407.3.2 Alphabetic Keys. Where provided, individual alphabetic keys shall be arranged in a QWERTY-based keyboard layout and the "F" and "J" keys shall be tactilely distinct from the other keys.	Supports	iPhone uses a non-mechanical, onscreen keyboard. An external Bluetooth wireless keyboard (available separately) can also be used for text input.
407.3.3 Numeric Keys. Where provided, numeric keys shall be arranged in a 12-key ascending or descending keypad layout. The number five key shall be tactilely distinct from the other keys. Where the ICT provides an alphabetic overlay on numeric keys, the relationships between letters and digits shall conform to ITU-T Recommendation E.161 (incorporated by reference, see 702.7.1).	Supports	iPhone uses a non-mechanical, onscreen keyboard. An external Bluetooth wireless keyboard (available separately) can also be used for text input.
407.4 Key Repeat. Where a keyboard with key repeat is provided, the delay before the key repeat feature is activated shall be fixed at, or adjustable to, 2 seconds minimum.	Supports	The repeat rate for the non-mechanical, onscreen keyboard is user configurable, along with Sticky keys and Slow keys under Accessibility settings. External wireless keyboards can be set in the same way.

Criteria	Conformance Level	Remarks and Explanations
407.5 Timed Response. Where a timed response is required, the user shall be alerted visually, as well as by touch or sound, and shall be given the opportunity to indicate that more time is needed.	Supports with exceptions	iPhone includes Switch Control which provides an alternate method for navigating and making onscreen selections. iPhone will cycle through and emphasize the available onscreen options, and users can make their desired selection by tapping the screen or using supported assistive devices. Switch Control allows for control of auto scan timing to remain on an item up to 25 seconds before moving to the next item, as well as the ability to loop through selections up to 10 times and to pause on the first item after pressing a switch.

Criteria	Conformance Level	Remarks and Explanations
407.6 Operation. At least one mode of operation shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum.	Supports	 iPhone includes a number of Accessibility features to support motor control: AssistiveTouch which provides an alternative set of screen gestures for users who may have difficulty with touch gestures that requires only a single finger or apparatus to operate. Switch Control which provides an alternate method for navigating and making onscreen selections. iPhone will cycle through and emphasize the available onscreen options, and users can make their desired selection by tapping the screen or using supported assistive devices. Touch Accommodations which provides a means to adjust how the screen responds to touches, such as controlling how long you touch before it's recognized or whether it ignores repeated touches. Back Tap which provides ability to configure and trigger convenient tasks when the back of the iPhone is tapped. Double tap and triple tap can be used. Voice Control allows users to navigate and interact with their iPhone using their voice to tap, swipe, type and more. You can speak commands just like you would perform an action by touch. Vocal Shortcuts - Users with moderate to severe atypical speech can set up Vocal Shortcuts to trigger actions in iOS. Users can drive voice interactions by creating custom utterances that iOS can understand, such as setting a timer, taking a screenshot, scrolling up and down, and checking the weather forecast. Eye Tracking gives users a built-in option for navigating iPhone with just their eyes, including dwell control to tap. Eye Tracking leverages the front facing camera and can be used with other features such as AssistiveTouch and Voice Control.
407.7 Tickets, Fare Cards, and Keycards. Where tickets, fare cards, or keycards are provided, they shall have an orientation that is tactilely discernible if orientation is important to further use of the ticket, fare card, or keycard.	Not applicable	Not applicable

Criteria	Conformance Level	Remarks and Explanations
407.8 Reach Height and Depth		
408 Display Screens	Not applicable	Not applicable
408.2 Visibility. Where stationary ICT provides one or more display screens, at least one of each type of display screen shall be visible from a point located 40 inches (1015 mm) above the floor space where the display screen is viewed.	Not applicable	Not applicable
408.3 Flashing. Where ICT emits lights in flashes, there shall be no more than three flashes in any one-second period.	Supports	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.
409 Status Indicators		
409.1 General. Where provided, status indicators shall be discernible visually and by touch or sound.	Supports	Action button and Camera Control provide haptic feedback. If Sticky Keys are enabled, a visual ideograph is displayed to indicate the state of the keys being pressed. VoiceOver also provides auditory recognition of status indicators such as caps lock.
410 Color Coding		
410.1 General. Where provided, color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supported with exceptions	 iOS uses color to convey information in On/Off labels, but provides the ability to enable labels in the Accessibility settings. There may be areas in individual apps, such as displaying events in Calendar, that do not provide another means of distinguishing a visual element. But iOS provides the ability to customize color filters to support color blindness and other vision challenges.

Criteria	Conformance Level	Remarks and Explanations
411 Audible Signals		
411.1 General. Where provided, audible signals or cues shall not be used as the only means of conveying information, indicating an action, or prompting a response	Supports	iPhone delivers visual alerts for incoming phone and FaceTime calls, new text messages, new and sent mail, and calendar events.
412 ICT with Two-Way Voice Communication		
412.2 Volume Gain		
412.2.1 Volume Gain for Wireline Telephones. Volume gain conforming to 47 CFR 68.317 shall be provided on analog and digital wireline telephones.	Not applicable	Not applicable
412.2.2 Volume Gain for Non-Wireline ICT. A method for increasing volume shall be provided for non-wireline ICT.	Supports	iPhone volume can be controlled via physical buttons on the device or through onscreen controls.
412.3 Interference Reduction and Magnetic Coupling		
412.3.1 Wireless Handsets. ICT in the form of wireless handsets shall conform to ANSI/IEEE C63.19-2011 (incorporated by reference, see 702.5.1).	Not applicable	Not applicable
412.3.2 Wireline Handsets. ICT in the form of wireline handsets, including cordless handsets, shall conform to TIA-1083-B (incorporated by reference, see702.9.1).	Not applicable	Not applicable
412.4 Digital Encoding of Speech. ICT in IP-based networks shall transmit and receive speech that is digitally encoded in the manner specified by ITU-T Recommendation G.722.2 (incorporated by reference, see 702.7.2) or IETF RFC 6716 (incorporated by reference, see 702.8.1).	Supports	iPhone supports wireless industry standards for the transmission of voice and data, including UMTS/HSPA+/ DC-HSDPA, GSM/EDGE, LTE, 5G (sub-6GHz and mmWave), Bluetooth 5.3, and 802.11 a/b/g/n/ac/ax Wi- Fi.

Criteria	Conformance Level	Remarks and Explanations
412.5 Real-Time Text Functionality	Supports (where supported by carrier)	iPhone supports RTT (where supported by carrier) including instant transmission of a message as it's being composed, as well as support for over 70 models of Bluetooth wireless Braille displays (sold separately) Users can combine RTT with LiveCaptions to follow along on calls
412.6 Caller ID. Where provided, caller identification and similar telecommunications functions shall be visible and audible.	Supports	iPhone supports audible caller ID using the built-in VoiceOver screen reader and can play distinctive ring- tones and text-tones. VoiceOver adds a Pronunciation Editor to customize the way words are pronounced, additional voices and support for multiple audio sources.
412.7 Video Communication. Where ICT provides real-time video functionality, the quality of the video shall be sufficient to support communication using sign language.	Supports	Users are able to use the FaceTime video calling feature for sign language communications. FaceTime requires that both parties to the call have an internet connection (e.g., via Wi-Fi or cellular data service) and a device capable of making a FaceTime video call. Group FaceTime calls will also detect when a participant is using sign language will make them appear more prominent within the call. FaceTime video calls have Live Captions integrated. Users can use Live Captions to follow along in-person conversations. FaceTime video calls include speaker attribution so users can keep up with all the details of who said what in a lively call with family and friends. Available on supported iPhone an iPad models in English (US and Canada).
413 Closed Caption Processing Technologies		

Criteria	Conformance Level	Remarks and Explanations
413.1.1 Decoding and Display of Closed Captions. Players and displays shall decode closed caption data and support display of captions.	Supports	iPhone supports the pass-through of closed-captioned video and video descriptions in industry-standard formats.
413.1.2 Pass-Through of Closed Caption Data. Cabling and ancillary equipment shall pass through caption data.	Supports	iPhone supports the pass-through of closed-captioned video and video descriptions in industry-standard formats.
414 Audio Description Processing Technologies		
414.1.1 Digital Television Tuners. Digital television tuners shall provide audio description processing that conforms to ATSC A/53 Digital Television Standard, Part 5 (2014) (incorporated by reference, see 702.2.1). Digital television tuners shall provide processing of audio description when encoded as a Visually Impaired (VI) associated audio service that is provided as a complete program mix containing audio description according to the ATSC A/53 standard.	Not applicable	Not applicable
414.1.2 Other ICT. ICT other than digital television tuners shall provide audio description processing.	Supports	iPhone supports the pass-through of audio descriptions in industry-standard formats.
415 User Controls for Captions and Audio Descriptions	Not applicable	Not applicable
415.1.1 Where ICT provides operable parts for volume control, ICT shall also provide operable parts for caption selection.	Not applicable	iPhone supports system-side platform settings for captions
415.1.2 Audio Description Controls. Where ICT provides operable parts for program selection, ICT shall also provide operable parts for the selection of audio description.	Not applicable	iPhone supports system-side platform settings for audio descriptions

Chapter 5: Software -

Refer to iOS 18 VPAT

Chapter 6: Support Documentation and Services -

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope		
602 Support Documentation		
602.2 Accessibility and Compatibility Features. Documentation shall list and explain how to use the accessibility and compatibility features required by Chapters 4 and 5. Documentation shall include accessibility features that are built-in and accessibility features that provide compatibility with assistive technology.	Supports	 iPhone product documentation is available online in an accessible HTML format through: Apple Support at <u>https://www.apple.com/support</u> iPhone new release page at <u>https://www.apple.com/iphone/</u> Accessibility product page at <u>https://www.apple.com/accessibility/iphone/</u> VPATs for Apple products are available at <u>https://support.apple.com/accessibility/vpat.</u>
602.3 Electronic Support Documentation. Documentation in electronic format, including Web- based self-service support, shall conform to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1).	See WCAG 2.0 section	The electronic web-based product documentation for iOS conforms to both Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0.

Criteria	Conformance Level	Remarks and Explanations
602.4 Alternate Formats for Non-Electronic Support Documentation. Where support documentation is only provided in non-electronic formats, alternate formats usable by individuals with disabilities shall be provided upon request.	Supports	Product documentation is available in embossed braille via third party provider.
603 Support Services		
603.2 Information on Accessibility and Compatibility Features. ICT support services shall include information on the accessibility and compatibility features required by 602.2.	Supports	Apple Support provides advisors with information on accessibility and compatibility features for iOS. This information is also documented in the product documentation.
603.3 Accommodation of Communication Needs. Support services shall be provided directly to the user or through a referral to a point of contact. Such ICT support services shall accommodate the communication needs of individuals with disabilities.	Supports	Support via the Internet is available through the Apple Knowledge base at <u>http://www.apple.com/support</u> . For additional information on the many service and support options offered by Apple visit <u>www.apple.com/ support</u> .

Legal Disclaimer:

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