

APX Net
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Accessibility Plan 2026-2029 – Accessible Canada Act (ACA)

INTRODUCTION

APX Net provides our employees with an equitable workplace and enhances the accessibility of our products and services. This Accessibility Plan, which has been prepared in accordance with the requirements of the Accessible Canada Act and its regulations (“ACA”), explains APX Net’s efforts to collect feedback from its employees, partners, and customers and to enhance its accessibility programs.

APX Net is committed to ensuring equal access and participation for people with disabilities and treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunities for all. As described below, we are committed to meeting the needs of people with disabilities in a timely manner.

GENERAL

Our Accessibility Plan and a description of our accessibility feedback process are available in a variety of formats. Please contact APX Net or the Accessibility Team, accessibility@apxnet.com, if you would like a copy of the plan in an accessible format.

CONSULTATIONS

Feedback Process

APX Net welcomes feedback from its employees, users, and the public. You can provide accessibility feedback (including feedback on this plan) by emailing our Accessibility Team at accessibility@apxnet.com, calling our Support Team at (207) 752-5000, by mail to APX Net, PO Box 842, Berwick, ME 03901, USA, or by filling out our online [Accessibility Feedback Form](#). Feedback can be provided anonymously by mail or using our Accessibility Feedback Form. Heidi Burns Wood of our Accessibility Team is responsible for responding to all feedback.

Employee Feedback

APX Net actively requests feedback from its employees, including persons with disabilities, and provides them with avenues to ask questions and provide direct feedback to their Human Resources representatives (which covers employee onboarding/offboarding, health and wellness, benefits, leaves and accommodations). APX Net sends surveys to its employees, including persons with disabilities, to gather feedback and understand areas of improvement related to, onboarding, training, and the ongoing employee experience. APX Net maintains an internal system whereby employees can file a request for issues including IT support (software or hardware) and understanding how to request an accommodation, to include a leave of absence.

Partner and Customer Feedback

Over the past year, APX Net has collected feedback on the accessibility of our products and services through discussions with employees with disabilities, by collecting customer and user feedback, and by working directly with our service provider partners to identify deficiencies in our accessibility features. In addition, APX Net previously

retained a third party to review the accessibility and accessibility compliance of APX Net's commercial website, www.apxnet.com.

EMPLOYMENT

Identified Barriers: internal processes

- There is an opportunity for greater engagement, promotion, and communications to support accessibility, encourage self-disclosure. APX Net strives in hosting a supportive workplace culture and community that embraces everybody regardless of disability or not.
- Employees may not be sufficiently comfortable with requesting resources available or implementing accommodations. Without further training and employee reminders, managers may be less successful in accommodating employees and removing barriers.

Action Steps:

- Our benefits team will review and identify opportunities to more clearly communicate to managers and employees what resources are available to employees who wish to request an accommodation.
- Further, the team will take action to elevate leaders' familiarity with accommodation processes and practical ways to increase these opportunities for all staff. APX prides itself on inclusion and accessibility in the workplace.
- We will continue to actively evaluate how well our processes for workplace accommodation are performing, including exploring if additional training on when and how to request an accommodation would be of value to employees.

THE BUILT ENVIRONMENT

Identified Barriers:

- APX Net does not have a physical office in Canada.

Action Steps:

- None at this time.

TRANSPORTATION

APX Net does not offer transportation services.

INFORMATION AND COMMUNICATION TECHNOLOGIES

Identified Barriers:

APX Net strives to provide products and services that can be used by all customers and users on an equal basis. Our goal is to remove barriers that prevent individuals from taking advantage of our next generation product and features. To that end, APX Net continuously has conversations with its partners, employees, and users to identify limitations of our products and services. APX Net identified the following barriers:

- Our website can be enhanced to provide more accessibility options including more consistent screen reader compatibility, better functionality for those who cannot use a mouse or trackpad, and compatibility with commercial assistive software.
- Our online monitoring portal can be enhanced to provide more accessibility features and compliance. .

Action Steps:

- We will enhance product functionality to work with screen readers, ensure products are usable by those who cannot manipulate a mouse or trackpad, and improve colored indicators so that they can be viewed by those with vision impairments.
- APX Net will also work with our 3rd party vendor to enhance online support and customer portal to include more accessibility features.

COMMUNICATIONS RELATED TO EMPLOYMENT AND THE APX NET ENVIRONMENT

Identified Barriers:

- Tools employees use for communication in the workplace including email, documents, APX Net applications may be challenging to navigate because of the large volume of information and complexity of the information.
- Individuals may not be aware of how they can request assistance if they face challenges with this communication.

Action Steps:

- APX Net will evaluate its internal guidelines and communications to individuals with concerns, including those seeking accommodation and leaves, to ensure the process is accessible, understandable and effective.
- APX Net will work on developing an information document that explains its practices to make the process for accessibility and accommodation requests easier and more transparent for employees.
- We will continue to collect feedback from partners and users and modify products and services as necessary and audit products and services for accessibility compliance.

DESIGN AND DELIVERY OF PRODUCTS AND SERVICES (INCLUDING CUSTOMER COMMUNICATIONS)

APX Net's goal is to offer clear communication and support options to all customers and potential customers. We want to ensure that our customer support services, marketing communications, and other communications provided to customers are available to people of all abilities and that those with disabilities have meaningful access to information and support. To do this, we must improve the accessibility of our communications and enhance our efforts to provide an exceptional customer experience.

Identified Barriers:

- Support team members have different levels of knowledge and awareness when it comes to the barriers experienced by customers with disabilities, such as how to respond to inquiries and requests for accommodations.
- Support and marketing documentation is not consistently provided in accessible formats.

Action Steps:

- APX Net will strive to make online support documentation available in accessible formats and explore additional training for support teams on responding to customers with disabilities.
- We will continue to monitor customer surveys and feedback to identify areas for improvement; train and coach team members on responding to individuals with accessibility challenges; and increase customer awareness of accessibility products and services.

PROCUREMENT OF GOODS, SERVICES, AND FACILITIES

APX Net prioritizes accommodating individuals with disabilities and providing them with the necessary tools so they can succeed at their jobs. We communicate our accessibility requirements to our vendors.

Identified Barriers:

- Existing vendor procurement practices may not consistently meet accessibility requirements.

Action Steps:

- APX Net will continue its efforts engaging in a supplier diversity program and will continue to evaluate procurement policies to improve accessibility.

APPENDICES

Appendix A – The Principles of the ACA

In preparing this plan, APX Net took into account the following Principles, which are set out in Section 6 of the ACA:

- all persons must be treated with dignity regardless of their disabilities;
- all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
- all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;
- persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

Appendix B - Telecommunications Act Requirements

As required by section 51(1) of the ACA, this Appendix lists the conditions imposed under Section 24.1 of the Telecommunications Act to which APX Net is subject that relate to the identification and removal of barriers and the prevention of new barriers. Except for the Accessibility Reporting Regulations under the ACA, the CRTC has not made any other accessibility-related telecommunications regulations.

- Telecommunications service providers (TSPs) must have an easy-to-find home page link to the accessibility section of the website and to promote, in an accessible manner, information on all of their disability-specific services and products. Telecom Regulatory Policy CRTC 2017-11.
- TSPs are to make the information on telecommunications services and products and any customer service functions on their websites available in an accessible manner to the point of providing reasonable accommodation to people with disabilities. Telecom Regulatory Policy CRTC 2017-11.
- Where customer service functions on websites are not accessible, persons with disabilities must not incur a charge or otherwise be disadvantaged if they use an alternate channel of customer service to access those functions.
- TSPs are to make their general call centres accessible by (a) training customer service representatives in handling enquiries from persons with disabilities, and familiarizing them with the service providers' products and services for persons with disabilities.
- TSPs must make available to subscribers who are blind billing statements, billing inserts, , and information setting out rates, terms, and conditions of service in accessible formats. Telecom Regulatory Policy CRTC 2017-11.
- TSPs must provide paper bills upon request and at no charge to customers with disabilities. Telecom and Broadcasting Decision CRTC 2022-28.
- Secondary Internet Service Providers (ISPs) must abide by CRTC restrictions on Internet traffic management practices (ITMP)s, including obtaining prior approval for certain ITMPs that could impede accessibility for people with disabilities. Telecom Regulatory Policy 2009-657.
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated entity agree upon and for which there is proof of the agreement. CRTC Accessibility Reporting Regulations, SOR/20211-160.
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines. CRTC Accessibility Reporting Regulations, SOR/20211-160.

Topics: Web Accessibility, WCAG 2.1 AA, Accessible Canada Act, Americans with Disabilities Act

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Version: vCR

Summary:

APX Net reached out to BuzzTheory for a statement regarding the APX Net website and its relation to the Accessible Canada Act (ACA) because of its service in Canada. Fortunately, the standards for the ACA are the same as the recent ruling by the DOJ regarding web accessibility. BuzzTheory's process for addressing the new web accessibility standards is below.

BuzzTheory, APX Net and Web Accessibility

In the United States, the Department of Justice and federal courts have consistently interpreted the Americans with Disabilities Act (ADA) to apply to digital spaces. While the DOJ recently codified WCAG 2.1 AA as the strict legal standard for *public* entities (Title II), private businesses (Title III) are subject to the ADA's general non-discrimination requirements.

In the absence of a specific codified regulation for private business, US courts and the DOJ frequently cite **WCAG 2.1 AA**, the same standard defined in the Accessible Canada Act, as the benchmark for accessibility. Adhering to this standard is the most effective method for ensuring APX Net remains accessible to all users and mitigates legal risk in both the US and Canada.

BuzzTheory plans to address accessibility standards with all client sites as follows:

1. **Conducting Comprehensive Audits:** We will use an industry-standard tool, WAVE, to measure your website's compliance with WCAG 2.1 AA standards.
2. **Addressing Compliance Issues:** We will correct identified accessibility issues to bring your website into compliance.
3. **Consulting on Complex Issues:** For issues requiring further discussion, we will work directly with you to find the best solutions.

Courts have separately ruled that documents provided on a website must also adhere to accessibility compliance (an extension-of-website principle). As with website evaluation, BuzzTheory plans to:

1. Inventory existing downloadable collateral.
2. Evaluate and implement necessary remediation for accessibility.
3. Consult APX Net on remediation issues that require direction.

BuzzTheory is prioritizing front-of-mind consideration for accessibility across website development and downloadable content for APX Net. We agree with the principle that web content should be accessible to all parties, and we invite end users to alert us to issues that emerge from technical failure or accidental oversight.