



VIA EMAIL/PDF

December 10 , 2013

Bill Kincaid
Associate General Counsel
421 Administration Building
University of Arkansas
Fayetteville, AR 72701

Re Arkansas Technology Access Clause

Dear Mr. Kincaid,

The Dymola product line ("Dymola Software") consists of a portfolio of Digital Product Design solutions for Systems Engineering and Simulation. The Dymola Software goes far beyond traditional simulation tools to offer a unique Digital Product Experience. The essential components of the Dymola Software include (1) a Modelica language translator, (2) interactive graphical user interfaces (GUI) for model development and simulation (3) form based interfaces which enable users to parameterize models, define simulation scenarios, manage simulation data and results, and collaborate on performance-based decision making.

The Dymola Software is not fully compliant with Section 508 accessibility standards. The user interface does contain certain accommodations that aid in accessibility, such as the ability to change colors and font sizes based on user-specified settings. While the Dymola Software does not disable standard accessibility features, neither does it contain special interfaces that may be necessary to enable third-party accessibility products. However, because the fundamental nature of the Dymola Software requires the user to visualize complex objects or visually manage simulation scenarios, it is not reasonable to expect that a person with severe visual impairment would be able to use the Dymola Software. The visual component of the Dymola Software, which is essential to products of this type, cannot be replaced or modified to be fully compliant with Section 508 accessibility standards.

While a severely visually impaired user might be able to access the design or engineering functions for design of relatively simple products, it would be highly implausible to utilize the full capability of the Dymola Software for its intended applications without the ability to see the graphical information that is essential for model development. The basic changes that would be required to make the Dymola Software fully compliant with Section 508 would not be possible without severely reducing its functionality and capability such that the modifications, even if possible or desirable, would result in a "fundamental alteration" of the Dymola Software within the meaning of Section 1194.3 of Section 508, General exceptions, which states: "This part shall not be construed to require a fundamental alteration in the nature of a product or its components." As a result, the Dymola Software is exempt from Section 508.

Sincerely



Daniel Barnes

Treasurer