



## Memorandum

**For:** Government Procurement Officers

**From:** Chief Legal Counsel, Dassault Systemes  
Simulia Corp.

**Re:** Dassault Systemes Simulia Corp.  
("SIMULIA") Finite Element Analysis  
Software – Section 508 of the Rehabilitation  
Act of 1973

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The SIMULIA suite of software products ("SIMULIA Software") consists of a scalable portfolio of Realistic Simulation solutions including the Abaqus product suite for Unified Finite Element Analysis, multiphysics solutions for insight into challenging engineering problems, and lifecycle management solutions for managing simulation data, processes, and intellectual property. The essential components of the SIMULIA Software include (1) text-based finite element analysis software or "solvers", (2) interactive graphical user interfaces (GUI) for pre- and post-processing (input and output) and for links to computer-aided design (CAD) products, and (3) form based interfaces which enable users to access models, define simulation scenarios, manage simulation data and results, and collaborate on performance-based decision making.

The SIMULIA 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 and to slow or stop animated presentations. While the SIMULIA 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 SIMULIA Software requires the user to visualize complex three-dimensional objects or visually manage complex simulation scenarios, it is not reasonable to expect that a person with severe visual impairment would be able to use the SIMULIA Software. The visual component of the SIMULIA 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 analysis functions or solvers using textual input and output for analysis of relatively simple problems, it would be highly implausible to utilize nearly the full capability of the SIMULIA Software for its intended applications without the ability to see the geometric and graphical information that is the essence of finite element analysis and simulation data management and that is used in conjunction with computer-aided design applications. The basic changes that would be required to make the SIMULIA 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 SIMULIA 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 SIMULIA Software is exempt from Section 508.