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Memorandum

To	Jane Boyce President, Tru Vue, Inc.		
From	Danielle Alexis Matthews; Matt Heller	Date	August 24, 2018
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Email	danielle.alexis.matthews@nortonrosefulbright.com; matt.heller@nortonrosefulbright.com		
Re	ADA Compliance of TruLife® Acrylic		
Attachments	(1) 2010 ADA Standards for Accessible Design; (2) 1991 ADA Standards for Accessible Design; (3) TruLife Facts and Specifications		

We, the undersigned legal counsel, have been asked to review whether the TruLife® Acrylic (“TruLife”) product is compliant with the Americans with Disabilities Act (“ADA”), as amended by the ADA Amendments Act of 2008 (42 U.S.C. §§ 12101 *et seq.*). We understand that Tru Vue strives to create products that may be used by all consumers, regardless of any disabilities, and takes considerable efforts to ensure that its products may be used in signs and other displays that comply with any and all local, state and/or federal laws. After reviewing physical samples of TruLife as well as relevant applicable law, it is our firm opinion that TruLife exceeds all applicable requirements under the law and is fully ADA compliant.

I. Compliance With the 2010 ADA Standards for Accessible Design

All new construction after September 15, 2010 must follow the requirements of the 2010 Standards for Public Accommodations and Commercial Facilities, including the standards set forth by the 2004 ADA and ABA Accessibility Guidelines, as amended. These standards apply to both State and local government facilities (Title II) as well as commercial facilities (Title III). In relevant part, the Accessibility Guidelines state as follows:

703 Signs

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703.5 Visual Characters. Visual characters shall comply with 703.5.

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703.5.1 Finish and Contrast. Characters and their background shall have a non-glare finish. Characters shall contrast with their

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background with either light characters on a dark background or dark characters on a light background.

[Advisory 703.5.1 Finish and Contrast. Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include shadows cast by lighting sources, surface glare, and the uniformity of the text and its background colors and textures.]

....

703.6 Pictograms. Pictograms shall comply with 703.6.

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703.6.2 Finish and Contrast. Pictograms and their field shall have a non-glare finish. Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field.

[Advisory 703.6.2 Finish and Contrast. Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include shadows cast by lighting sources, surface glare, and the uniformity of the text and background colors and textures.]

....

703.7 Symbols of Accessibility. Symbols of accessibility shall comply with 703.7.

703.7.1 Finish and Contrast. Symbols of accessibility and their background shall have a non-glare finish. Symbols of accessibility shall contrast with their background with either a light symbol on a dark background or a dark symbol on a light background.

[Advisory 703.7.1 Finish and Contrast. Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include shadows cast by lighting sources, surface glare, and the uniformity of the text and background colors and textures.]

The 2010 standards require only that visual characters, pictograms, and symbols of accessibility in signage employ a non-glare finish and contrast with their background. The U.S. Department of Justice ("DOJ"), which is responsible for promulgating ADA standards for accessible design, also advises that signs should allow for contrast and limit shadows and surface glare to the extent possible to accommodate persons with visual impairments.

TruLife reflects less than 1.5% of light—as opposed to the 8% of diffused light reflected by traditional non-glare acrylic. Moreover, TruLife offers over 98% light transmission and blocks over 99% of UV rays, making it ideal for display signage. TruLife’s design reduces surface glare and presents vibrant colors and contrasts, even in outdoor settings. TruLife comports with all of the 2010 ADA accessibility standards.

II. Compliance With the 1991 ADA Standards for Accessible Design

Both State and local government facilities (Title II) as well as commercial facilities (Title III) constructed before September 15, 2010 must comply with the 1991 ADA Standards for Accessible Design. In relevant part, the Accessibility Guidelines state as follows:

4.30 Signage.

4.30.1 General. Signage required to be accessible by 4.1 shall comply with the applicable provisions of 4.30.

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4.30.5 Finish and Contrast. The characters and background of signs shall be eggshell, matte, or other non-glare finish. Characters and symbols shall contrast with their background—either light characters on a dark background or dark characters on a light background.

The clarity of TruLife is ideal for use in any ADA-compliant signage. TruLife may be used over eggshell, matte, or non-glare finishes, and Tru Vue’s innovative formula facilitates sharp contrasts between characters and backgrounds. TruLife comports with all of the 1991 ADA accessibility standards.

III. Conclusion

TruLife’s anti-reflective design may be used to display images that are accessible to persons with visual impairments. TruLife complies with both the 2010 and 1991 ADA Standards for Accessible Design because it facilitates displays of sharp contrasts with minimal glare.

Sincerely,

/s/ Danielle Alexis Matthews

Attachments



DAM/MEH