Section 508 vs. EU EAA / EN 301 549: Self-Service Kiosk Compliance Matrix

Executive summary

For a kiosk platform intended to ship on both sides of the Atlantic, the two regimes are technically convergent and legally divergent. The dimensional and volume requirements in EN 301 549 V3.2.1 clause 8.3 were harmonised with the U.S. Access Board's hardware provisions, so reach heights (1220 mm / 48 in, 1170 mm / 46 in, 1120 mm / 44 in), screen visibility (1015 mm / 40 in), force limits (22.2 N / 5 lbf) and speaker amplification (65 dBA) are effectively identical to Revised 508 Standards Chapter 4. The meaningful differences are in four places:

1. **Tactile input.** Section 508 requires at least one tactilely discernible input control **for each function** (407.3, 407.3.1), which in practice rules out a touchscreen-only closed-functionality kiosk. The EAA conditions its tactile requirement on keys and controls being present at all — "shall have an adequate contrast and tactilely discernible keys and controls **when keys and controls are available**" (Annex I, Section I, 2(o)(i)). The U.S. is stricter here.
2. **Private listening and hearing technology.** EN 301 549 names the connector (3.5 mm jack or industry-standard connection), requires it to be usable **without vision**, and requires private-data audio to be routed **only** to a private-listening mechanism (5.1.3.2, 5.1.3.9); the EAA adds compatibility with hearing aids, telecoils, cochlear implants and assistive listening devices (Annex I 2(o)(i)). Section 508 requires magnetic coupling only where output is delivered by a transducer held to the ear (402.3.1). The EU is stricter here.
3. **Speech-mode discoverability.** Section 508 requires contracted **braille** instructions for initiating speech mode (402.2.5); EN 301 549 requires only a **tactile indication** of the means to initiate speech mode on shared-use ICT (8.5), while the EAA prohibits requiring an accessibility feature to be activated in order to turn it on (Annex I 2(o)(i)). Each regime is stricter on a different axis; a universal build needs both braille and a discoverable, non-dependent activation path.
4. **Installed geometry and paperwork.** EN 301 549 regulates the kiosk's own footprint — clear floor space of 760 mm × 1220 mm, ramping at no steeper than 1:48, alcove approach widths of 915 mm / 1525 mm, and mandatory installation instructions (8.3.4, 8.3.6) — where Section 508 leaves the surrounding space to the facility standards. The EU also imposes product-law obligations that have no U.S. analogue: technical documentation, an EU declaration of conformity, and CE marking before placing on the market (Articles 16–18 and Annex IV).

Legal architecture: the difference that shapes everything else

Dimension	United States	European Union
Instrument	Revised 508 Standards, 36 CFR Part 1194 Appendix C (ICT procured, developed, maintained or used by federal agencies) (Cornell LII)	Directive (EU) 2019/882, the European Accessibility Act, a market-access law binding all economic operators (EUR-Lex)

Dimension	United States	European Union
Trigger	Federal procurement and use; not a general market rule	Placing a product on the EU market or providing a covered service
Technical detail lives in	The regulation itself (Chapters 3 and 4) (Cornell LII)	Functional requirements in Annex I; technical detail in the harmonised standard EN 301 549 (ETSI)
Private-sector kiosks	Covered indirectly: ADA 2010 Standards §707 reaches ATMs and fare machines (2010 ADA Standards §707); HHS added a kiosk provision for Section 504 recipients at 45 CFR 84.83 (HHS final rule)	Covered directly: payment terminals, ATMs, ticketing and check-in machines, and interactive information terminals (Recital 26)
Conformity evidence	Convention (VPAT/ACR); no statutory marking	Mandatory: technical documentation, EU declaration of conformity, CE marking (Arts. 16–18, Annex IV)
Relief valve	Undue burden / fundamental alteration under agency 508 processes	Article 14 fundamental alteration or disproportionate burden, documented and retained five years (Art. 14)
Legacy fleet	No general grandfather clause for procured ICT	Terminals lawfully in use before 28 June 2025 may run to end of economic life, max 20 years (Art. 32(2))

The practical consequence: a U.S. vendor can win a commercial kiosk deal with no 508 exposure at all, but the same hardware cannot enter the EU without a documented conformity file. Conversely, an EU-compliant terminal can fail a U.S. federal solicitation on braille and tactile-key grounds alone.

Matrix 1 — Speech output

Requirement	Section 508 clause and text	EU: EAA Annex I	EU: EN 301 549 V3.2.1 clause	Verdict
Duty to provide speech	402.2: "ICT with a display screen shall be speech-output enabled for full and independent use by individuals with vision impairments," with six exceptions (Cornell LII)	Self-service terminals "shall provide for text-to-speech technology" (Annex I 2(o)(i))	5.1.3.1 requires at least one non-visual mode of operation where visual information is needed for functions closed to screen readers (ETSI)	Overlap in substance; 508 is drafted as an absolute obligation for any display screen, EN as conditional on closed functionality
Coverage of on-screen content	402.2.1: "Speech output shall be provided for all information displayed on-screen" (Cornell LII)	Not itemised	5.1.3.6 requires speech for non-text content per WCAG 2.1 SC 1.1.1; 5.1.3.7 for pre-recorded video; 5.1.3.15 for detected input errors (ETSI)	**508 stricter on breadth** ("all information"); **EN more granular** on media and error states
Transactional outputs / receipts	402.2.2: speech "shall audibly provide all information necessary to verify a transaction" (Cornell LII)	Not itemised	5.1.3.16 requires speech covering all information needed to complete or verify the transaction; printed itineraries and maps exempt (ETSI)	Effectively identical; EN carves out maps/itineraries

Requirement	Section 508 clause and text	EU: EAA Annex I	EU: EN 301 549 V3.2.1 clause	Verdict
Delivery mechanism and coordination	402.2.3: delivered through a mechanism "readily available to all users, including... an industry standard connector or a telephone handset"; recorded, digitised or synthesised; "coordinated with information displayed on the screen" (Cornell LII)	Personal headsets must be usable (Annex I 2(o)(i))	5.1.3.2 mandates either built-in output or a personal headset via a 3.5 mm jack or industry-standard connection usable "without requiring the use of vision"; 5.1.3.3 recommends (should) audio/screen correlation (ETSI)	**Split**: EN stricter on the connector and non-visual connection; **508 stricter on coordination**, which EN makes advisory
User control of speech	402.2.4: automatic interrupt when a transaction is selected; "capable of being repeated and paused" (Cornell LII)	Not itemised	5.1.3.4 interrupt and repeat on request, subject to security; 5.1.3.5 mandatory interruption on user action and on new speech (ETSI)	Near-parity; EN's interruption trigger is broader (any user action), 508 requires pause
Language	Silent	Silent	5.1.3.14: speech "shall be in the same human language as the displayed content," with four exceptions (ETSI)	**EU stricter** — decisive for multilingual EU deployments
Non-interfering audio	Silent (411 bars audible signals as the sole channel) (Cornell LII)	Requires reduction of interfering audio signals and audio clarity (Annex I 2(g))	5.1.3.10 bars automatically playing interfering audio longer than three seconds concurrently (ETSI)	**EU stricter**, with a testable three-second threshold
Discovery of speech mode	402.2.5: braille instructions for initiating speech mode, contracted braille per 36 CFR 1191 App. D §703.3.1 (Cornell LII); mirrored by ADA 707.8 (2010 ADA Standards)	An accessibility feature must not have to be activated in order for a user who needs it to turn it on (Annex I 2(o)(i))	8.5 tactile indication of the means to initiate speech mode on shared-use ICT; 5.2 activation of accessibility features without relying on an unsupported method (ETSI)	**508 stricter on the medium** (braille required); **EU stricter on the logic** (no bootstrap dependency)
Screen behaviour with speech on	405.1: "When speech output required by 402.2 is enabled, the screen shall not blank automatically" (Cornell LII)	Product must protect the user's privacy when using accessibility features (Annex I 2(k))	No equivalent explicit clause	**508 stricter and more specific**; note the direct tension with EU privacy framing, resolved by private listening rather than screen blanking

Section 508's six exceptions to 402.2 are the most consequential drafting difference in this category: variable message signs conforming to 402.5, status-indicator-only screens conforming to 409, memory- or processor-constrained ICT, audible tones in place of speech for masked security input, machine location/date/time/account number/machine identifier, and advertisements that carry no transactional information (Cornell LII). The EU framework has no

comparable enumerated list; relief is obtained instead through the Article 14 disproportionate-burden assessment, which must be documented and retained (Art. 14). Design teams should therefore treat the 508 exceptions as U.S.-only latitude and not as a global content-exclusion list.

Matrix 2 — Private listening, headphones and hearing technology

Requirement	Section 508	EU: EAA Annex I	EU: EN 301 549 V3.2.1	Verdict
Headphone / personal-headset support	Implied by 402.1 (operable without attaching AT "other than personal headsets or other audio couplers") and 402.2.3's industry-standard connector (Cornell LII)	Explicit: terminals "shall allow for the use of personal headsets" (Annex I 2(o)(i))	5.1.3.2(b) 3.5 mm jack or industry-standard connection, connectable without vision; 5.1.2.2 confirms personal headsets and induction loops are not "assistive technology" for closed functionality (ETSI)	**EU stricter**: named connector plus a non-visual connection requirement
Private routing of sensitive audio	405.1 requires the same degree of privacy of input and output for all individuals; 402.2 Exception 4 permits tones for masked entry (Cornell LII)	Privacy when using accessibility features (Annex I 2(k))	5.1.3.8 bars speaking masked characters unless delivery is known to be private or the user opts in; 5.1.3.9 requires private data to be delivered **only** through a private-listening mechanism connectable without vision (ETSI)	**EU clearly stricter** — a testable routing rule versus a U.S. principle of equal privacy
Private-listening volume control	402.3.1: where private listening is provided, a mode of operation for controlling volume (Cornell LII)	User control of volume and speed (Annex I 2(g))	5.1.3.11: at least one **non-visual** mode of operation for controlling volume (ETSI)	**EU stricter**: the control itself must be operable non-visually
Speaker amplification	402.3.2: incremental volume control with amplification "up to a level of at least 65 dB," plus automatic reset to default after every use (Cornell LII)	User control of volume; enhanced audio features (Annex I 2(g))	5.1.3.12: non-visual incremental control with amplification to at least 65 dBA (−29 dBPaA); 5.1.3.13 reset to 65 dBA or less after every use unless single-user ICT (ETSI)	Numerically identical; **EN more testable** (A-weighting stated) and requires the control to be non-visual
Hearing-aid coupling	402.3.1: magnetic wireless coupling required only where output is delivered by "an audio transducer typically held up to the ear" (Cornell LII)	Where the product uses audio or audible signals, it "shall be compatible with assistive devices and technologies available at Union level, including hearing technologies such as hearing aids, telecoils, cochlear implants and assistive listening devices" (Annex I 2(o)(i))	Magnetic coupling appears in the two-way voice provisions rather than as a general kiosk duty in V3.2.1 (ETSI)	**EU markedly stricter**: a handset-free touchscreen kiosk with a speaker still owes hearing-technology compatibility in the EU, but not under 402.3.1

Requirement	Section 508	EU: EAA Annex I	EU: EN 301 549 V3.2.1	Verdict
Auditory alternative to visual alerts	302.4 and 302.5 functional criteria; 409 status indicators discernible visually and by touch or sound (Cornell LII)	Alternative to audible signals required (Annex I 2(e))	5.1.5 requires visual information equivalent to auditory output for closed functions (ETSI)	Parity

The design conclusion is unambiguous: a single 3.5 mm jack, mounted where a blind user can find it by touch, with a non-visual volume control, a per-session volume reset, and a telecoil or ALD-compatible audio path, satisfies both regimes. Building only to 402.3.1 leaves an EU gap on hearing-technology compatibility; building only to the EAA leaves a U.S. gap on volume reset semantics and coordination.

Matrix 3 — Tactile controls and operable parts

Requirement	Section 508	ADA 2010 §707 (U.S. facility layer)	EU: EAA Annex I	EU: EN 301 549 V3.2.1	Verdict
Tactile control per function	407.3: at least one input control conforming to 407.3 "for each function"; 407.3.1: "operable by touch and tactilely discernible without activation" (Cornell LII)	707.6.1: at least one tactilely discernible input control per function; membrane keys must be discernible from surroundings and adjacent keys (2010 ADA Standards)	Tactile discernibility owed only "when keys and controls are available" (Annex I 2(o)(i))	5.5.2: a means to discern each operable part without vision and without activating it (ETSI)	**U.S. clearly stricter** — 508 and ADA presuppose physical or tactilely distinguishable controls; the EAA's conditional wording tolerates a glass-only interface with speech output
Numeric keypad	407.3.3: 12-key ascending or descending layout, tactilely distinct 5 key, alphabetic overlay per ITU-T E.161 (Cornell LII)	707.6.2: 12-key telephone layout, tactilely distinct 5 key (2010 ADA Standards)	Not itemised	8.4.1: physical numeric keys in a rectangular keypad shall have the 5 key tactilely distinct (ETSI)	Overlap on the 5 key; **508 stricter** on layout order and E.161 mapping
Alphabetic keys	407.3.2: QWERTY-based layout, tactilely distinct F and J (Cornell LII)	Not addressed	Not itemised	Not specified for hardware keyboards on terminals	**508 stricter**

Requirement	Section 508	ADA 2010 §707 (U.S. facility layer)	EU: EAA Annex I	EU: EN 301 549 V3.2.1	Verdict
Function-key symbols	Not prescribed	707.6.3.2: raised circle (Enter/Proceed), left arrow (Clear/Correct), letter ex (Cancel), plus sign (Add Value), minus sign (Decrease Value) (2010 ADA Standards)	Not itemised	Not prescribed	**U.S. uniquely prescriptive** for ATMs and fare machines; adopt it as the de facto global convention
Contrast on keys	407.2: keys and controls contrast visually from background; characters and symbols contrast light-on-dark or dark-on-light (Cornell LII)	707.6.3.1 for function keys, with an exception for required tactile symbols (2010 ADA Standards)	"Adequate contrast" on keys and controls (Annex I 2(o)(i))	Contrast on hardware is a named clause area in the V4.1.0 draft's clause 8.8 (ETSI draft V4.1.0 contents)	Comparable in intent; **neither side sets a numeric hardware contrast ratio** — an open specification gap
Grasp, pinch, twist	407.6: at least one mode operable with one hand, no tight grasping, pinching or twisting; activation force 5 lbf (22.2 N) maximum (Cornell LII)	707.3 routes operable parts to §309 (2010 ADA Standards)	Sequential control, alternatives to fine motor control, no simultaneous controls, tactilely discernible parts (Annex I 2(h))	5.5.1 and 8.4.2.1 require an accessible alternative where grasping/pinching/twisting is needed; 8.4.2.2 requires an alternative where force exceeds 22.2 N (ETSI)	**508 stricter in form**: it caps force outright, whereas EN permits a high-force control if a low-force alternative exists
Status indication	409.1: status indicators discernible visually **and** by touch or sound (Cornell LII)	707.3: each operable part differentiable by sound or touch without activation unless a clear/correct key is provided (2010 ADA Standards)	More than one sensory channel for information, control and orientation (Annex I 2(a))	5.6.1 tactile or auditory status for locking/toggle controls; 5.6.2 visual status where non-visual status is given (ETSI)	Parity, with EN adding the reciprocal visual-status duty

Requirement	Section 508	ADA 2010 §707 (U.S. facility layer)	EU: EAA Annex I	EU: EN 301 549 V3.2.1	Verdict
Tickets, cards, media	407.7: tactilely discernible orientation where orientation matters (Cornell LII)	—	Not itemised	8.4.3: same requirement for keys, tickets and fare cards (ETSI)	Identical
Timed responses	407.5: alert visually and by touch or sound, with an opportunity to request more time (Cornell LII)	—	Alert via more than one sensory channel and the possibility to extend the time given; consistency of functionality and "enough, and flexible amounts of, time" (Annex I 2(m), 2(o)(i))	5.7 key repeat delay adjustable to at least 2 s; 5.8 double-strike delay adjustable to at least 0.5 s; 5.9 no required simultaneous actions (ETSI)	Parity on the alert; **EU slightly stricter** on extension as an affirmative capability, and on flexible interaction time generally
Biometrics	403.1: biometrics not the sole means of identification or control, unless two different biological characteristics are offered (Cornell LII)	—	Alternative to biometric identification and control required (Annex I 2(l))	Addressed via functional performance and closed-functionality clauses	**EU stricter**: no two-modality safe harbour

Matrix 4 — Physical height, reach and positional accessibility

Parameter	Section 508 407.8 / 408	EU: EN 301 549 V3.2.1 clause 8.3	Divergence
Reference geometry	407.8.1: vertical reference plane, 48 in (1220 mm) minimum length for side reach, 30 in (760 mm) minimum for forward reach (section508.gov)	Expressed directly as forward/side reach conditions without a reference-plane construct (ETSI)	Same envelope, different measurement method; the 508 plane construct is the harder one to document
Unobstructed high reach	48 in (1220 mm) maximum, forward (407.8.3.1) and side (407.8.2.1) (Cornell LII)	8.3.2.1 and 8.3.3.1: 1220 mm (48 in) maximum (ETSI)	Identical
Unobstructed low reach	15 in (380 mm) minimum (Cornell LII)	8.3.2.2 and 8.3.3.2: 380 mm (15 in) minimum (ETSI)	Identical

Parameter	Section 508 407.8 / 408	EU: EN 301 549 V3.2.1 clause 8.3	Divergence
Obstructed forward reach	Table 407.8.3.2.1: reach depth under 20 in (510 mm) → 48 in (1220 mm) max; 20–25 in (510–635 mm) → 44 in (1120 mm) max; maximum forward reach 25 in (635 mm) (Cornell LII)	8.3.2.3.2 and 8.3.2.3.3: <510 mm → 1220 mm max; 510 mm to <635 mm → 1120 mm max, measured above the ICT's floor contact (ETSI)	Identical thresholds; EN references the ICT's own floor contact, 508 the floor
Obstructed side reach	407.8.2.2: >10 in (255 mm) to 24 in (610 mm) beyond the plane → 46 in (1170 mm) max, 15 in min, and never beyond 24 in; 407.8.2 caps the reached-over portion at 34 in (865 mm) (section508.gov)	8.3.3.3.1 and 8.3.3.3.2: obstruction height below 865 mm (34 in); depth ≤255 mm → 1220 mm max; >255 mm up to 610 mm → 1170 mm (46 in) max (ETSI)	Identical
Knee and toe space	407.8.3.2.2: 27 in (685 mm) high min, 25 in (635 mm) deep max, 30 in (760 mm) wide min, clear of obstructions, with toe-space and taper exceptions (Cornell LII)	8.3.2.4 clearance width ≥760 mm; 8.3.2.5 toe clearance below 230 mm with ≥430 mm depth and a 150 mm projection limit; 8.3.2.6 knee clearance in the 230–685 mm band with ≥280 mm at 230 mm, ≥205 mm at 685 mm, and a 25 mm-per-150 mm taper (ETSI)	Same envelope, **EN more granular** — it specifies minimum depths within the knee band that 508 leaves to the ADA facility standard
Clear floor space	Not in Chapter 4; supplied by ADA §707.2 → §305 for covered machines (2010 ADA Standards)	8.3.4.2: 760 mm × 1220 mm minimum clear floor area where the ICT has an operating area within it (ETSI)	**EU stricter as a product requirement**: the numbers match ADA §305 but the duty attaches to the terminal itself, including enclosures and pods
Approach and level change	Facility standards	8.3.4.1: internal level changes ramped no steeper than 1:48, with ≤6.4 mm vertical and ≤13 mm at 1:2 exceptions; 8.3.4.3.2: 915 mm minimum width for forward approach in alcoves deeper than 610 mm; 8.3.4.3.3: 1525 mm for parallel approach in alcoves deeper than 380 mm (ETSI)	**EU stricter for enclosed or booth-style terminals**; no 508 hardware analogue
Display visibility	408.2: at least one of each display type visible from 40 in (1015 mm) above the floor space (Cornell LII); ADA 707.7.1 identical (2010 ADA Standards)	8.3.5: legible from a point 1015 mm above the centre of the operating-area floor (ETSI)	Same height; **EN's "legible" is a higher bar than 508's "visible"**
Character size on screen	402.4: sans serif, 3/16 in (4.8 mm) minimum cap-height based on "I" where no screen enlargement is provided, with light-on-dark or dark-on-light contrast (Cornell LII)	5.1.4: where closed to text enlargement, a capital "H" must subtend at least 0.7 degrees at the supplier's specified viewing distance — 3.1 mm at 250 mm, 6.1 mm at 500 mm, 7.3 mm at 600 mm (ETSI)	**Genuine divergence**: 508 sets a fixed floor, EN a distance-relative angle. EN is stricter beyond roughly 400 mm viewing distance and more permissive at close range — a real risk for tall, far-viewed digital-signage-style terminals

Parameter	Section 508 407.8 / 408	EU: EN 301 549 V3.2.1 clause 8.3	Divergence
Installation guidance	Not required	8.3.6: installation instructions must be provided, addressing built-environment accessibility requirements applicable to the installation (ETSI)	**EU-only obligation**, and a common audit finding for otherwise compliant hardware
Operable-part role restriction	407.8 second sentence: parts used with required speech output may not be the only type of operable part complying with 407.8 unless it is the only part of its type (Cornell LII)	No direct equivalent	**508-only nuance** that trips up designs where a single audio jack or navigation pad is treated as satisfying reach compliance for the whole machine

Where the standards genuinely overlap

The overlap is broad enough that a single hardware platform is realistic:

- **Dimensional envelope.** Unobstructed 1220/380 mm, obstructed forward 1220/1120 mm, obstructed side 1170 mm with a 865 mm obstruction ceiling, 635 mm maximum forward reach, and 760 mm minimum clearance width appear in both regimes with the same numbers (Cornell LII, ETSI).
- **Screen sightline.** 1015 mm / 40 inches in Section 508 408.2, EN 8.3.5 and ADA 707.7.1.
- **Audio amplification and reset.** 65 dB(A) with an automatic post-transaction reset in both 402.3.2 and EN 5.1.3.13.
- **Force ceiling.** 22.2 N in 407.6 and EN 8.4.2.2.
- **Speech for transaction verification.** 402.2.2 and EN 5.1.3.16 ask the same question in nearly the same words.
- **Tactile 5 key and media orientation.** 407.3.3 / 407.7 versus EN 8.4.1 / 8.4.3.
- **Non-visual mode as a first principle.** 302.1 "at least one mode of operation that does not require user vision" (Cornell LII) versus Annex I 2(a)'s multi-sensory duty with "alternatives to vision, auditory, speech and tactile elements" (EAA Annex I) and EN 5.1.3.1.

Where they diverge, and which way

Category	Stricter standard	Controlling clause	Consequence for a universal design
Speech coverage of on-screen content	**US**	402.2.1 "all information displayed on-screen"	Voice the entire UI, not just transactional steps
Speech coordination with the display	**US**	402.2.3 (mandatory) vs EN 5.1.3.3 (should)	Keep focus-synchronised audio, no orphaned prompts
Speech language matching	**EU**	EN 5.1.3.14	Ship TTS voices for every displayed language, and gate language selection non-visually
Interfering audio	**EU**	EN 5.1.3.10 (three-second rule)	No ambient attract-loop audio over a speech session

Category	Stricter standard	Controlling clause	Consequence for a universal design
Private routing of personal data	**EU**	EN 5.1.3.8, 5.1.3.9	Suppress or reroute PII and masked entry unless a headset is detected or the user opts in
Headset connector specificity	**EU**	EN 5.1.3.2 (3.5 mm, findable without vision)	Standardise on a tactilely locatable 3.5 mm jack, not a proprietary port
Hearing-technology compatibility	**EU**	EAA Annex I 2(o)(i)	Provide telecoil/ALD-compatible audio even on handset-free kiosks
Non-visual volume control	**EU**	EN 5.1.3.11, 5.1.3.12	Physical or gesture-based volume control, not a touchscreen slider only
Tactile input per function	**US**	407.3, 407.3.1, ADA 707.6.1	A tactile navigation cluster is mandatory for U.S. federal and ATM/fare deployments
Keypad layout and E.161 mapping	**US**	407.3.3	Use a 12-key telephone-order pad with a distinct 5 key everywhere
Function-key tactile symbols	**US**	ADA 707.6.3.2	Adopt the raised circle / arrow / ex / plus / minus set globally
Braille speech-mode instructions	**US**	402.2.5, ADA 707.8	Contracted braille label at the headset jack
Feature activation without bootstrapping	**EU**	EAA Annex I 2(o)(i), EN 5.2	Speech must be startable by a user who cannot already see or use the screen
Force cap versus alternative means	**US**	407.6 caps at 22.2 N absolutely	Design every operable part under 22.2 N rather than relying on an alternative
Biometric alternatives	**EU**	EAA Annex I 2(l)	Always provide a non-biometric path; the 508 two-modality exception does not travel
Clear floor space, level change, alcove approach	**EU**	EN 8.3.4	Enclosures, pods and privacy booths must be dimensioned as part of the product
Installation instructions	**EU**	EN 8.3.6	Ship an accessibility installation guide with every unit
Character size on closed displays	**Depends on viewing distance**	402.4 fixed 4.8 mm vs EN 5.1.4 0.7° angular	Compute against the declared viewing distance, then apply whichever is larger
Screen must not blank with speech on	**US**	405.1	Keep the screen active; achieve privacy through private listening instead
Documentation and market entry	**EU**	Arts. 16–18, Annex IV	Technical file, EU declaration of conformity and CE marking before placing on the market
Enumerated exceptions	**EU is stricter in effect**	402.2 Exceptions 1–6 have no EU counterpart; relief only via Art. 14	Do not build EU firmware around U.S. exception categories

Universal build sheet: designing to the union of both

A kiosk specified as follows satisfies the stricter side of every category above.

Speech and audio

- Full-UI text-to-speech covering all on-screen information, non-text alternatives, video equivalents and error identification, with pause, repeat and automatic interruption on any user action.
- Speech language automatically matched to the displayed language for every supported locale.
- Speech synchronised with visual focus; screen never blanks while speech is enabled.
- Speaker path: non-visual incremental control to at least 65 dBA, automatic reset to ≤65 dBA at session end.
- No concurrent interfering audio exceeding three seconds.
- Transaction verification fully spoken; receipts and confirmations covered.

Private listening

- Tactilely locatable 3.5 mm jack, connectable without vision, with contracted braille instructions adjacent to it.
- Masked entry and any data classed as private routed only to the headset unless the user explicitly opts into open audio.
- Non-visual volume control for the headset path.
- Telecoil, hearing-aid, cochlear-implant and ALD-compatible audio.

Tactile and operable parts

- At least one tactilely discernible, non-activating control for every function, plus a tactile speech-mode initiator.
- 12-key telephone-order numeric pad with a distinct 5 key and E.161 alphabetic mapping; QWERTY-based alpha keys with distinct F and J where a keyboard is provided.
- ADA raised-symbol set on function keys: circle, left arrow, ex, plus, minus.
- One-handed operation, no grasp/pinch/twist, no operable part exceeding 22.2 N.
- Timed responses signalled on at least two sensory channels with a user-invoked extension.
- Non-biometric alternative always available.

Geometry

- Primary operable parts within 380–1220 mm; 1120 mm ceiling where forward reach depth is 510–635 mm; 1170 mm where side reach depth is 255–610 mm; reached-over surfaces below 865 mm.
- Knee/toe clearance 685 mm high, ≤635 mm deep, ≥760 mm wide, with EN's internal depth minima respected.

- 760 mm × 1220 mm clear floor space designed into any enclosure, alcove approaches at 915 mm forward / 1525 mm parallel, internal level changes at 1:48 or gentler.
- Display legible from 1015 mm above the operating position; character height set to the greater of 4.8 mm and 0.7° at the declared viewing distance; sans serif with light-on-dark or dark-on-light contrast.

Documentation

- EU technical file, declaration of conformity and CE marking, referencing the harmonised standard clauses applied (Annex IV).
- Accessibility installation instructions per EN 8.3.6.
- Accessibility conformance report mapping both 36 CFR 1194 App. C and EN 301 549 clauses, plus a documented Article 14 assessment wherever an EU requirement is not met.
- Instructions describing the interface, functionality and assistive-device interfacing per EAA Annex I 1(b)(vii)–(ix), including the list of assistive devices tested with the product (EAA Annex I).

Regulatory watch list

- **EN 301 549 V4.1.0 (2025-11) draft.** Circulating as a harmonised European standard containing an annex on conformance with Directive 2019/882 and referencing WCAG 2.2, with a restructured hardware chapter — new clause groupings include 5.1.7 access without speech, 5.1.8 identify input purpose, 8.2 hardware products with speech output, 8.2.2 magnetic coupling, 8.7 colour on hardware and 8.8 contrast on hardware (ETSI draft V4.1.0). Two shifts matter for kiosks: magnetic coupling is promoted into the hardware chapter, and hardware colour and contrast become named clauses, closing the current numeric-contrast gap. Version V4.1.1 is expected in 2026 (EN 301 549 overview). The revision responds to Commission standardisation request M/587 of 14 September 2022 (ETSI mandate list, EC rolling plan). Until a V4 citation appears in the Official Journal, V3.2.1 remains the version to design and document against.
- **U.S. Access Board, Accessibility Guidelines for Self-Service Transaction Machines (RIN 3014-AA44).** Still at proposed-rule stage; an ANPRM published 21 September 2022 at 87 FR 57662, with an NPRM projected but not issued on the published timetable. It would amend 36 CFR parts 1190/1191/1192 for fixed self-service transaction machines including kiosks, information transaction machines and POS devices, with DOJ and DOT expected to adopt the guidelines as enforceable ADA standards and HHS free to adopt them under Section 504 (Unified Agenda entry). This is the rule that would close the current U.S. gap between federal-procurement 508 and the ADA's ATM-and-fare-machine-only §707.
- **HHS Section 504 rule.** The 2024 final rule added a subpart requiring recipients to ensure that web content, mobile content and kiosks they provide or make available are accessible (HHS regulatory impact analysis), extending kiosk obligations to federally funded healthcare and human-services deployments through 45 CFR 84.83 (Federal Register, 9 May 2024).
- **EAA legacy window.** Member States may allow terminals lawfully in use before 28 June 2025 to continue in similar service to end of economic life, capped at 20 years from entry into use (Art. 32(2)). Refresh planning, not retrofit, is the usual answer for fielded fleets.

Limitations of this comparison

Three caveats bound the analysis. First, the EAA is a directive: Member State transpositions can add detail or enforcement nuance beyond Annex I, and this matrix compares the directive text rather than 27 national laws. Second, EN 301 549 V3.2.1 is the currently published version; the V4.1.0 draft reorganises the hardware chapter, and clause numbers cited here will move when V4 is formally cited in the Official Journal. Third, neither regime sets a numeric contrast ratio for physical keys and controls, and neither sets a mounting-height rule for the display itself as distinct from the sightline test — both remain matters of engineering judgement, best resolved by designing to the 1015 mm sightline plus the angular character-height calculation.