

**Accessibility: Canadian Radio-television and Telecommunications Commission Regulation/ACA**

**Windstream Enterprise's Accessibility Progress Report**  
**in compliance with the Accessible Canada Act**  
**(the "Progress Report")**

**I. GENERAL****a. Introduction**

This Progress Report is prepared in compliance with the Accessible Canada Regulations: SOR/2021-241 and Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations: SOR/2021-160 under the Accessible Canada Act ("ACA").

The regulations under the ACA require that Windstream Enterprise establish, implement, maintain, and document an Accessibility Plan (the "Plan") as well as publish a Progress Report concerning the implementation of the Plan. This Progress Report, dated June 1, 2024, is publicly available, including in an accessible format upon request.

**b. Feedback Process**

Employees of Windstream Enterprise and members of the public can provide feedback on matters relating to accessibility and the Plan at any time through multiple channels, including email, phone, or mail.

Windstream Enterprise has designated an Accessibility Coordinator as the contact for issues related to the Plan. The Accessibility Coordinator receives feedback on behalf of Windstream and addresses accessibility concerns. The Accessibility Coordinator promotes the objectives contained in the Plan.

**c. Contact Information**

A conspicuous posting of Windstream Enterprise's Accessibility Statement and feedback form can be found on its publicly accessible website, at:

<https://www.windstreamenterprise.com/legal/accessibility-plan/>.

The Plan is also linked on Windstream Enterprise's homepage.

*Windstream's efforts are ongoing, and we strive to continuously improve accessibility. We want to hear from you if you encounter any accessibility barriers. A version of Windstream's Accessibility Plan may be available to you in large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities. Please contact Windstream with accessibility related questions, comments, suggestions, and complaints by phone at 1-855-348-7843, [windstream.windstreamaccessibility@windstream.com](mailto:windstream.windstreamaccessibility@windstream.com), live chat, in-person, or mail at:*

*Accessibility Coordinator  
Windstream  
4005 North Rodney Parham Road  
Little Rock, AR 72212-2442*

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*Any personal information submitted via the feedback process must be treated as confidential unless the submitter specifically consents to the disclosure of such information.*

In addition, Windstream Enterprise will provide a copy of this Plan to any member of the public upon request, and in alternative formats including 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 parties agree upon. Requests for copies can be sent to [windstream.windstreamaccessibility@windstream.com](mailto:windstream.windstreamaccessibility@windstream.com).

**II. POLICIES, PROGRAMS, PRACTICES, AND SERVICES**

Windstream Enterprise is committed to making its services accessible to the entire community in a way that promotes equality and strives to prevent and remove barriers that limit equitable access to all people. We are dedicated to meeting the needs of persons with disabilities effectively and efficiently in order to create an accessible user and employee experience. The Plan provides guidance for the development of Windstream Enterprise's processes and procedures related to the implementation of products, services, and platform engagements.

Windstream Enterprise supports the principles contained in the ACA and considers the following as it continues to implement its Plan:

1. Everyone must be treated with dignity;
2. Everyone must have the same opportunity to make for themselves the life they are able and wish to have;
3. Everyone must be able to participate fully and equally in society;
4. Everyone must have meaningful options and be free to make their own choices, with support if they desire;
5. Laws, policies, programs, services, and structures must consider the ways that different kinds of barriers and discrimination intersect;
6. Persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures; and
7. Accessibility standards and regulations must be made with the goal of achieving the highest level of accessibility.

**a. Employment**

The Plan applies to all Windstream Enterprise employees responsible for developing, designing, managing, maintaining, and auditing Windstream's websites, website portals, mobile applications, products and services.

To further implement its Plan, Windstream Enterprise incorporates harassment prevention training into its annual training programs intended to reinforce the company's commitment to the principles above. Further, all employees are encouraged to participate in training and

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development to learn the benefits of and how to contribute to an inclusive workplace. Windstream Enterprise makes available several development courses related to disability inclusion, invisible disability awareness, and how to request workplace accommodations.

**b. Built Environment**

Windstream Enterprise does not operate retail locations and the vast majority of its space is identified as network locations; however, persons with disabilities can face barriers in their workplaces. To prevent and address these challenges, Windstream Enterprise offers flexible work arrangements for its employees, maintains procedures to address accommodation requests, and strives to address any physical, environmental barrier experienced by persons with disabilities.

**c. Information and Communication Technologies**

Windstream Enterprise delivers managed connectivity, communications and security solutions to its customers. The company's advanced communications services and products are accessible by persons with disabilities. As discussed further in the Employee and Design and Delivery of Program and Services sections, Windstream Enterprise continues to identify barriers and implement measures consistent with the principles of the ACA and its Plan.

**d. Communication other than IT**

Windstream works closely with its partners and internal creative teams to ensure our digital brand presence and advanced communications services and products adhere to accessibility guidelines and requirements so that persons with disabilities can access and understand all of the critical information therein.

**e. Procurement of Goods and Services**

Windstream Enterprise requires all of its underlying providers to comply with a Supplier Code of Conduct, and its procurement team takes proactive measures to enable businesses owned by minorities, women, veterans, and service-disabled veterans, to fully participate as an integral part of our supplier base. To further address barriers, the company continually evaluates its accessibility requirements and Supplier Code of Conduct to meet the standards contained in this Plan.

**f. Design and Delivery of Program and Services Design and Delivery of Program and Services**

The Plan applies to Windstream Enterprise's telecommunications services including VoIP data services, video conferencing services and the tools that support the services including but not limited to: Windstream Enterprise website, WE Connect Portal, and other mobile applications. Additionally, these obligations extend to telecommunication services or products Windstream Enterprise may acquire from a third-party provider.

Windstream Enterprise strives to ensure its products and services are routinely enhanced to provide more accessibility. Windstream Enterprise continues to develop a compliance checklist in accordance with industry guidance to be utilized before any new product, service,

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or update is deployed in order to ensure and optimize accessibility. Windstream Enterprise aims to utilize this procedure alongside product management and development as well as web content creation.

**g. Transportation**

Transportation, as identified in the ACA, does not apply to Windstream Enterprise as a priority area at this time. However, as part of service delivery, employees may be transported to various locations; recognizing that, the company identified one main opportunity that could impact persons with disabilities: the general understanding that modernization should be prioritized. Accordingly, Windstream initiated a fleet renewal effort to increase the average MPG of the fleet through the use of GPS/telematics solutions as well as new vehicles with reduced emissions.

**III. CONSULTATIONS**

As part of developing Windstream Enterprise's Progress Report, it engaged in consultation of its employees, particularly members of its Employee Resource Group, WINAbility. WINAbility is dedicated to fostering a culture of inclusion that welcomes people of all abilities while seeking opportunities to serve employees with disabilities. Partnering with WINAbility, Windstream Enterprise shared a survey requesting feedback on the priority areas of the ACA and the Plan's progress over the past 12 months in making Windstream Enterprise's services, website and mobile applications more accommodating and accessible. This survey was open to all WINAbility members, including those who may identify as a person with disabilities. Further, Windstream Enterprise's Accessibility Coordinator was responsible for reviewing any feedback received from the public via its external website since the implementation of the Plan in 2023.

**IV. FEEDBACK****a. Accessibility Coordinator**

Windstream Enterprise's Accessibility Coordinator is responsible for responding to comments and inquires regarding the Plan.

**b. Feedback Received**

At the time of this Progress Report, Windstream Enterprise's Accessibility Coordinator has received no comments, complaints, or inquiries regarding its published plan. Windstream Enterprise stands ready to provide a copy of its Plan to any member of the public upon request, and in alternative formats including 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 parties agree upon. Requests for copies can be sent to [windstream.windstreamaccessibility@windstream.com](mailto:windstream.windstreamaccessibility@windstream.com).

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## V. REFERENCES AND CITATIONS

Windstream Enterprise strives to meet accessibility requirements in compliance with Section 503 and 504 of the Rehabilitation Act of 1973, as amended; the Americans with Disabilities Act (ADA) of 1990; and the ADA Amendments Act (ADAAA) of 2008.; the Canadian Radio-television and Telecommunications Commission (“CRTC”) Accessibility Planning and Reporting Regulations; Accessible Canada Regulations, SOR/2021-241; the Accessible Canada Act (S.C. 2019, c. 10); and Web Content Accessibility Guidelines 2.0, W3C World Wide Web Consortium Recommendation, Level A & Level AA Success Criteria. (<http://www.w3.org/TR/200X/REC-WCAG20-20081211/>).