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# PDF ACCESSIBILITY AUDIT REPORT

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WCAG 2.1 AA · Section 508 · PDF/UA-1

Prepared for

**Meridian County Transit Authority**

Rider's Guide and Reduced-Fare Program Application, FY 2026

|                         |                                                             |
|-------------------------|-------------------------------------------------------------|
| <b>Audited file</b>     | MCTA_RG_FY26_v7_FINAL2.pdf (24 pages, 3.8 MB)               |
| <b>Report reference</b> | TT-A11Y-2026-0142                                           |
| <b>Audit dates</b>      | 1–5 September 2026                                          |
| <b>Report issued</b>    | 8 September 2026                                            |
| <b>Prepared by</b>      | Taika Translations LLC — Accessibility Services, Austin, TX |
| <b>Version</b>          | 1.0 — Final                                                 |

**SAMPLE REPORT.** The client, the audited document and every finding in this report are fictional and were written to show the depth and format of a Taika Translations PDF Accessibility Audit deliverable. Real reports are prepared for your document only and are confidential to you.

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## Document control

|                            |                                                                                                                                                |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| Client                     | Meridian County Transit Authority (MCTA) — Communications Manager, Customer Experience Division                                                |
| Document audited           | Rider's Guide and Reduced-Fare Program Application, FY 2026 — MCTA_RG_FY26_v7_FINAL2.pdf                                                       |
| Source files received      | InDesign package (MCTA_RG_FY26.indd, links, fonts); no source for the application form (fields added in Acrobat)                               |
| Service                    | PDF Accessibility Audit — single document up to 25 pages, manual review with keyboard and screen-reader testing                                |
| Standards assessed         | WCAG 2.1 Level AA; Section 508 (36 CFR 1194, 2017 Refresh, incorporating WCAG 2.0 AA); PDF/UA-1 (ISO 14289-1:2014) via Matterhorn Protocol 1.1 |
| Auditor / QA               | Taika Translations LLC, Accessibility Services — IAAP-certified lead reviewer; second reviewer for internal QA                                 |
| Report reference / version | TT-A11Y-2026-0142 — v1.0 Final, issued 8 September 2026 (draft v0.9 for internal QA, 5 September 2026)                                         |
| Distribution               | Client only. May be shared with the client's vendors for the purpose of remediation.                                                           |

**How to read this report.** Section 1 is for decision makers; Sections 2–4 explain what was tested and where the document stands; Sections 5–6 list and detail every finding; Section 7 is the remediation plan. Findings carry stable identifiers (F-01 to F-19) — please quote them when discussing fixes. Page numbers inside findings refer to the audited document.

# 1. Executive summary

We audited the Meridian County Transit Authority's Rider's Guide and Reduced-Fare Program Application, FY 2026 (24 pages) against WCAG 2.1 Level AA, Section 508 and PDF/UA-1, using automated checkers followed by a full manual review with keyboard-only navigation and two screen readers (NVDA and JAWS). The document was produced in Adobe InDesign and exported as a tagged PDF; the application form fields were added afterwards in Acrobat.

### Overall result

**The document does not currently conform to any of the three standards.** It is a text-based, tagged PDF with a sound visual design, which is a good starting point, but the tagging is incomplete and inconsistent, the application form is unusable with a screen reader, and one security setting prevents most assistive technology from reading the document at all.

The good news is that the majority of issues originate in the InDesign file and can be fixed there once, so that every future export inherits the fix. We estimate 24–28 hours of remediation work, about two thirds of it in the source file.

## Results at a glance

19

findings

15 / 50

WCAG 2.1 A/AA success criteria failed

17 / 31

PDF/UA-1 Matterhorn checkpoints with failures

| Standard                   | Result           | Basis                                                                                                                                      |
|----------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| WCAG 2.1 Level AA          | Does not conform | 15 of 50 Level A/AA success criteria fail (11 Level A, 4 Level AA); 13 pass; 22 not applicable to a static PDF                             |
| Section 508 (2017 Refresh) | Does not conform | E205.4 requires WCAG 2.0 AA; all 15 failing criteria exist in WCAG 2.0. Chapter 5 clauses 502.2.2, 502.3.1, 502.3.3 and 502.3.10 also fail |
| PDF/UA-1 (ISO 14289-1)     | Does not conform | 412 machine-checkable failures across 17 Matterhorn checkpoints; 6 human-checked failure conditions confirmed                              |

| Severity | Count | Share of findings |
|----------|-------|-------------------|
| Critical | 4     | 21%               |
| High     | 5     | 26%               |
| Medium   | 7     | 37%               |
| Low      | 3     | 16%               |

## The five issues that matter most

1. **Security settings block screen readers (F-01).** A single checkbox in the file's security settings stops NVDA, JAWS and most other assistive technology from reading anything. Five minutes to fix; it should be the first change made.
2. **The reduced-fare application cannot be completed by a screen-reader user (F-02).** All 31 form fields are unlabeled. The audience this form is designed for — older riders and riders with disabilities — is the audience most likely to rely on assistive technology.
3. **Route maps have no text alternative (F-03).** The four route maps carry the only description of where each route goes. Blind riders receive nothing.
4. **Fare and schedule tables have no header cells (F-04).** Prices and times are read out without their column and row context, making the tables meaningless by ear.
5. **The document language is not set and the Spanish section is unmarked (F-05).** The Spanish translation — added specifically to serve Spanish-speaking riders — is read with an English voice and is unintelligible.

## Recommended path

We recommend a source-first remediation: unblock the file (Phase 0, under one hour), correct the InDesign document and re-export (Phase 1, about 14 hours), then complete the form fields, table touch-up and metadata in the PDF (Phase 2, about 8 hours), followed by verification with the same tools and screen readers used in this audit (Phase 3, about 4 hours). Section 7 lays out the plan, and the accompanying remediation quote prices Phases 0–3 as a fixed fee, with the \$299 audit fee credited in full.

## 2. Scope and document profile

### 2.1 Document profile

|                      |                                                                                                         |
|----------------------|---------------------------------------------------------------------------------------------------------|
| File name            | MCTA_RG_FY26_v7_FINAL2.pdf                                                                              |
| Title (metadata)     | — (empty; see F-06)                                                                                     |
| Pages / size         | 24 pages, US Letter, 3.8 MB                                                                             |
| PDF version          | 1.7 (ISO 32000-1)                                                                                       |
| Producer / Creator   | Adobe InDesign 20.4 (Windows); Adobe PDF Library 17.0; post-processed by a third-party compression tool |
| Tagged PDF           | Yes — 1,112 structure elements; StructTreeRoot present; MarkInfo /Marked true                           |
| Text layer           | Genuine text (not a scanned image); 6 fonts, 5 embedded (see F-19)                                      |
| Interactive elements | 31 form fields (AcroForm), 14 link annotations, 0 bookmarks, 0 multimedia                               |
| Languages            | English (pages 1–19, 23–24); Spanish (pages 20–22)                                                      |
| Security             | Owner password; printing allowed; content copying and accessibility extraction not allowed (see F-01)   |

|                      |                                                                                                                                                                                                  |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Content types</b> | Body text in one and two columns, sidebars, 7 informative figures (maps, diagram), 1 photograph, 8 icons, 6 data tables, 9 lists, 7 footnotes, 1 table of contents, 1 four-page application form |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 2.2 What was tested

The full document, every page, was reviewed for the following: tag tree and semantic structure; reading order; heading hierarchy; lists; tables and header-cell associations; presence and quality of alternative text; artifacting of decorative content; form fields (labels, tooltips, tab order, keyboard operability, grouping); link annotations and link text; color contrast and use of color; document language and language of parts; title and metadata; bookmarks and table of contents; fonts and character mapping; security settings; and whether the file is genuine text or a scanned image.

## 2.3 Out of scope

- Legal certification of compliance. This report documents conformance against the named standards; it is not a legal opinion and no PDF can be “ADA certified”.
- The MCTA website, the online version of the reduced-fare application, and any other documents.
- Editorial quality of the translation on pages 20–22 (available as a separate service).
- Usability beyond accessibility — for example whether the fare structure is easy to understand — except where it intersects with a success criterion.

**Assumptions.** The InDesign package provided is the current source and MCTA can re-export from it; where a fix is recommended “in the source”, the relevant feature exists in the InDesign version used. The application form has no source file and will be remediated in the PDF.

# 3. Methodology

Our audit combines automated checking, which is fast and thorough at finding structural defects, with manual review, which is the only way to judge whether a heading is at the right level, whether alt text actually describes an image, whether a table reads sensibly by ear, or whether a form can be completed. Roughly a third of the findings in this report cannot be detected by any automated tool.

## 3.1 Standards and versions

| Standard    | Version assessed                                                         | Notes                                                                                                                                                                                     |
|-------------|--------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| WCAG 2.1    | W3C Recommendation, 5 June 2018 (errata to 21 Sep 2023), Level AA        | Applied to PDF using the W3C PDF Techniques (PDF1–PDF23). WCAG 2.2 adds nine criteria, none of which changes the result for a static PDF; a 2.2 delta assessment is available on request. |
| Section 508 | 36 CFR Part 1194, Appendix A and C (2017 Refresh, effective 18 Jan 2018) | E205.4 incorporates WCAG 2.0 Level AA by reference for electronic content; Chapter 5 (502) applies to the document’s interoperability with assistive technology.                          |
| PDF/UA-1    | ISO 14289-1:2014                                                         | Assessed using the Matterhorn Protocol 1.1 (PDF                                                                                                                                           |

| Standard | Version assessed | Notes                                                                                                                                                                                      |
|----------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                  | Association): 31 checkpoints, 136 failure conditions, 89 machine-checkable and 47 human-checked. PDF/UA-2 (ISO 14289-2:2024) is not yet required by U.S. procurement and was not assessed. |

## 3.2 Tools and assistive technology

| Tool                          | Version / configuration                                                                              | Used for                                                                                                            |
|-------------------------------|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| Adobe Acrobat Pro             | 2025 release (25.001), Accessibility Checker (full check, all 32 rules) and Preflight PDF/UA profile | Automated structural check; Tags, Order and Content panels; Reading Order tool; Table Editor; form field inspection |
| PAC 2024                      | PDF Accessibility Checker 2024, PDF/UA Foundation                                                    | Matterhorn Protocol machine checks; Screen Reader Preview; logical structure view                                   |
| NVDA                          | 2025.1 with Adobe Acrobat Reader (2025) and Firefox on Windows 11                                    | Primary screen-reader test: linear reading, headings/links/form-field lists, table navigation, forms mode           |
| JAWS                          | 2025 with Adobe Acrobat Reader on Windows 11                                                         | Secondary screen-reader test to confirm behavior is not NVDA-specific                                               |
| VoiceOver                     | macOS 15 with Preview and Safari                                                                     | Spot check of title, language and figure announcements                                                              |
| TPGi Colour Contrast Analyser | 3.5                                                                                                  | Contrast ratios sampled from the rendered PDF at 100%; color-blindness simulation                                   |
| Keyboard only                 | Acrobat Reader, Windows                                                                              | Tab order, focus visibility, operability of fields and links without a mouse                                        |
| Structural inspection script  | In-house, based on pikepdf                                                                           | Dump of structure tree, role map, /Lang, /Alt, /Scope, widget /TU and permission flags to cross-check the checkers  |

## 3.3 Procedure

1. Intake: confirm the file is genuine text, record the document profile (Section 2.1), and inspect security settings and metadata.
2. Automated pass: run the Acrobat Accessibility Checker and PAC 2024, export both reports, and record every rule and Matterhorn checkpoint result.
3. Structural review: walk the tag tree page by page in Acrobat and PAC, comparing it with the visual layout; check headings, lists, tables, figures, artifacts, links, notes and form structure.
4. Manual checks that no tool can perform: quality of alt text, correctness of heading levels, reading order in context, color contrast and use of color, link text, language of parts.
5. Assistive-technology testing: perform the task-based protocol in Appendix D with NVDA and JAWS, and spot-check with VoiceOver; record what is announced.

6. Keyboard-only pass: complete the application form and follow every link using the keyboard alone.
7. Analysis: consolidate observations into findings, map each to the success criteria, Section 508 clauses and PDF/UA clauses it fails, rate severity by user impact, and decide the best fix location.

### 3.4 Severity rating

| Rating   | Definition                                                                                             | Typical examples                                                                                   |
|----------|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| Critical | Blocks a group of users from a core task with no workaround, or blocks assistive technology altogether | Security flag; unlabeled form; informative images without alt text; tables without headers         |
| High     | Makes a core task substantially harder, slower or unreliable for a group of users                      | Missing language; missing title; broken heading hierarchy; wrong reading order                     |
| Medium   | Causes confusion, extra effort or loss of secondary information                                        | Untagged links; low-contrast captions; footnotes not associated; decorative content not artifacted |
| Low      | Conformance or quality issue with limited direct impact on users                                       | Metadata gaps; TOC not tagged; a non-embedded font                                                 |

## 4. Conformance scorecard

This section summarizes the result per standard. Appendix A lists every WCAG 2.1 success criterion, Appendix B every Matterhorn checkpoint, and Appendix C the Section 508 mapping.

### 4.1 WCAG 2.1 Level AA — by principle

| Principle        | Criteria applicable | Pass      | Fail      | Failing criteria                         | Related findings                                                 |
|------------------|---------------------|-----------|-----------|------------------------------------------|------------------------------------------------------------------|
| 1 Perceivable    | 10                  | 5         | 5         | 1.1.1, 1.3.1, 1.3.2, 1.4.1, 1.4.3        | F-02, F-03, F-04, F-08, F-09, F-11, F-12, F-14, F-15, F-16, F-19 |
| 2 Operable       | 10                  | 4         | 6         | 2.4.1, 2.4.2, 2.4.3, 2.4.4, 2.4.5, 2.4.6 | F-02, F-06, F-07, F-10, F-13, F-17                               |
| 3 Understandable | 7                   | 4         | 3         | 3.1.1, 3.1.2, 3.3.2                      | F-02, F-05                                                       |
| 4 Robust         | 1                   | 0         | 1         | 4.1.2                                    | F-01, F-02                                                       |
| <b>Total</b>     | <b>28</b>           | <b>13</b> | <b>15</b> | <b>11 × Level A, 4 × Level AA</b>        | —                                                                |

Twenty-two of the 50 Level A/AA criteria are not applicable to a static PDF with simple form fields (time-based media, motion, pointer gestures, timing, status messages and similar). Of the 28 applicable criteria, 15 fail. Because 11 of the failures are at Level A, the document does not reach Level A either.

## 4.2 Section 508

Section 508 (E205.4) requires electronic content to meet WCAG 2.0 Level AA, which is a subset of WCAG 2.1 AA: all 15 failing criteria above exist in WCAG 2.0, so the document fails E205.4. Of the Chapter 5 software clauses, 502.2.2 (no disruption of accessibility features), 502.3.1 (object information), 502.3.3 (row and column headers) and 502.3.10 (text) fail; 502.3.2 and 502.3.14 pass. Appendix C gives the clause-by-clause mapping.

## 4.3 PDF/UA-1 (Matterhorn Protocol 1.1)

| Measure                                                   | Result                                                                                                 |
|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| Checkpoints with at least one failure                     | 17 of 31                                                                                               |
| Machine-checkable failure conditions triggered (PAC 2024) | 412 errors across 21 failure conditions                                                                |
| Human-checked failure conditions confirmed                | 6 (heading levels, alt text quality, reading order, table header meaning, link text, artifact meaning) |
| PDF/UA identifier present                                 | No (F-18)                                                                                              |
| Overall                                                   | Does not conform to PDF/UA-1                                                                           |

## 4.4 Automated checker results (for reference)

Clients often run the same tools, so we record their raw output: the Acrobat Pro Accessibility Checker passed 16 of its 32 rules, failed 14 and flagged 2 for manual check; PAC 2024 reported 412 errors across 21 machine-checkable Matterhorn failure conditions. These counts are a starting point, not a verdict — neither tool can judge alt-text quality, heading levels or reading order. Both tool reports are supplied with this document.

# 5. Findings summary

All findings, ordered by severity. Each identifier links to its full entry in Section 6. Page numbers refer to the audited document.

| ID                   | Finding                                                                      | Pages          | Severity | Primary criterion            | Fix in |
|----------------------|------------------------------------------------------------------------------|----------------|----------|------------------------------|--------|
| <a href="#">F-01</a> | Security settings block assistive-technology access                          | Whole document | Critical | 1.3.1 Info and Relationships | PDF    |
| <a href="#">F-02</a> | Application form fields have no accessible names, tooltips or structure tags | 14–17          | Critical | 1.3.1 Info and Relationships | PDF    |
| <a href="#">F-03</a> | Route maps and service diagrams have no text alternative                     | 6, 7, 8, 9, 21 | Critical | 1.1.1 Non-text Content       | Source |
| <a href="#">F-04</a> | Fare and schedule tables lack header cells and header associations           | 10, 11, 18, 19 | Critical | 1.3.1 Info and Relationships | Source |

| ID                   | Finding                                                                                   | Pages                  | Severity | Primary criterion               | Fix in |
|----------------------|-------------------------------------------------------------------------------------------|------------------------|----------|---------------------------------|--------|
| <a href="#">F-05</a> | Document language is not set; Spanish section is not marked                               | Whole document; 20–22  | High     | 3.1.1 Language of Page          | Source |
| <a href="#">F-06</a> | No document title; file name shown in the title bar                                       | Whole document         | High     | 2.4.2 Page Titled               | Source |
| <a href="#">F-07</a> | Heading levels skip and several section titles are not tagged as headings                 | 3, 4, 5, 12, 13, 20    | High     | 1.3.1 Info and Relationships    | Source |
| <a href="#">F-08</a> | Reading order interleaves columns and sidebars                                            | 4, 5, 12, 13           | High     | 1.3.2 Meaningful Sequence       | Source |
| <a href="#">F-09</a> | Bulleted and numbered lists are not tagged as lists                                       | 5, 12, 15, 19, 22      | High     | 1.3.1 Info and Relationships    | Source |
| <a href="#">F-10</a> | Hyperlinks are not tagged and several use non-descriptive text                            | 2, 3, 17, 23, 24       | Medium   | 2.4.4 Link Purpose (In Context) | Source |
| <a href="#">F-11</a> | Insufficient color contrast for captions, footnotes and map labels                        | 4, 6–9, 10, 11, 16, 24 | Medium   | 1.4.3 Contrast (Minimum)        | Source |
| <a href="#">F-12</a> | Color alone indicates “no service” in the schedule tables and route status                | 13, 18, 19             | Medium   | 1.4.1 Use of Color              | Source |
| <a href="#">F-13</a> | No bookmarks in a 24-page document                                                        | Whole document         | Medium   | 2.4.5 Multiple Ways             | Source |
| <a href="#">F-14</a> | Decorative graphics and page furniture are in the content tree instead of being artifacts | All pages              | Medium   | 1.1.1 Non-text Content          | Source |
| <a href="#">F-15</a> | Footnotes are not structurally associated with their references                           | 10, 11, 16             | Medium   | 1.3.1 Info and Relationships    | Source |
| <a href="#">F-16</a> | Running headers, footers and page numbers are read as content                             | All pages              | Medium   | 1.3.2 Meaningful Sequence       | Source |
| <a href="#">F-17</a> | Table of contents is not tagged as TOC and entries are not linked                         | 2                      | Low      | 2.4.5 Multiple Ways             | Source |
| <a href="#">F-18</a> | Metadata incomplete: no PDF/UA identifier, author and subject fields unhelpful            | Whole document         | Low      | PDF/UA 5, 7.1                   | PDF    |
| <a href="#">F-19</a> | One font is not embedded and one lacks a Unicode mapping                                  | 6–9, 3                 | Low      | 1.3.1 Info and Relationships    | Source |

## 6. Detailed findings

Each finding follows the same structure: where it occurs, which criteria it fails, what we observed, how we confirmed it, what it means for a real user, how to fix it and where (source file or PDF), the estimated effort, and how we will verify the fix.

## F-01 Security settings block assistive-technology access

|                 |                                                                                                                                                                                                               |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>CRITICAL</b> Pages: Whole document · Area: Security · Fix in: PDF (Acrobat) — first step · Effort: Low — 5 minutes                                                                                         |
| Criteria failed | <b>WCAG 2.1:</b> 1.3.1 Info and Relationships (A); 4.1.2 Name, Role, Value (A) <b>Section 508:</b> 502.2.2 (No disruption of accessibility features); E205.4 <b>PDF/UA-1:</b> 7.1 (Matterhorn 26-001, 26-002) |

**What we found** The file is protected with an owner password that disables “Content copying” and “Content copying for accessibility”. The permissions flag P has bit 10 (extract for accessibility) cleared.

**How we confirmed it** Document Properties › Security shows “Content Copying for Accessibility: Not Allowed”. With NVDA and Acrobat Reader the document is announced as “empty document” or “Alert: this document is protected”. In Chrome’s PDF viewer, text can still be read but no structure is exposed. Acrobat Checker: “Accessibility permission flag — Failed”. PAC 2024: 26-002.

**Real-world impact** This setting alone prevents most screen readers from reading anything in the document, regardless of how well it is tagged. A blind rider who opens the guide in Acrobat Reader hears that the document is empty. It also blocks reflow, text-to-speech and translation tools used by riders with low vision or limited English.

**Remediation** Fix in the PDF as the first step of remediation: remove the security or re-apply it with “Enable text access for screen reader devices for the visually impaired” checked. If the agency requires copy protection for policy reasons, this option keeps that protection while restoring AT access. Add the setting to the export checklist so it is not reintroduced.

**Verification** Security tab shows accessibility access allowed; NVDA reads the document; PAC reports zero 26-xxx.

## F-02 Application form fields have no accessible names, tooltips or structure tags

|                 |                                                                                                                                                                                                                                                                                                           |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>CRITICAL</b> Pages: 14–17 · Area: Forms · Fix in: PDF (Acrobat Pro / scripted) · Effort: Medium — approx. 4–5 hours for 31 fields including QA                                                                                                                                                         |
| Criteria failed | <b>WCAG 2.1:</b> 1.3.1 Info and Relationships (A); 2.4.3 Focus Order (A); 3.3.2 Labels or Instructions (A); 4.1.2 Name, Role, Value (A) <b>Section 508:</b> 502.3.1, 502.3.2, 502.3.3, 502.3.10; E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.18.1, 7.18.3, 7.18.4 (Matterhorn 25-004, 25-005, 25-012, 28-004) |

**What we found** The Reduced-Fare Program Application (pages 14–17) contains 31 interactive fields: 22 text fields, 8 checkboxes and 1 signature field. None of the widgets carries a /TU (tooltip) entry, and none is enclosed in a Form structure element with an OBJR reference. Field names are the auto-generated defaults from Acrobat (“Text Field 1” ... “Text Field 22”, “Check Box 3”). The two “Type of fare requested” checkbox groups use identical export values (“Yes”), so selecting one option does not deselect the other. The document’s tab order is set to “Unspecified” rather than “Use Document Structure”.

**How we confirmed it** NVDA 2025 with Acrobat Reader: Tab key moves through every field; each is announced only as “edit” or “check box” with no label. JAWS 2025 forms mode: identical result. Acrobat Pro Accessibility Checker: “Form field descriptions — Failed” (31 instances), “Tab order — Failed” (4 pages). PAC 2024: 31 × Matterhorn 28-004 (form field has no name), 31 × 25-005 (widget annotation not tagged as Form).

**Real-world impact** A screen-reader user cannot complete the reduced-fare application independently. Every one of the 31 fields is presented as an anonymous “edit” box, so the applicant has no way of knowing whether they are entering a name, a date of birth or a case number. Because the checkbox groups share export values, a user who selects “Senior (65+)” and then “Person with a disability” ends up with both boxes

checked and no indication that only one is allowed. In practice this means the applicant must ask a sighted person to fill the form for them, which defeats the purpose of the program.

**Remediation** Fix in the PDF (Acrobat Pro). This is form-layer work that cannot be done in InDesign. For each widget: set a meaningful field name (e.g. applicant\_last\_name) and a /TU tooltip that reads as a label (“Last name”, “Date of birth (MM/DD/YYYY)”), tag each widget as a Form element containing the OBJR, nested under the P that holds its visible caption; give each checkbox in a group a unique export value; set every page’s tab order to “Use Document Structure”; add required-field indication in the tooltip (“Required”) rather than color alone. Provide the same key on the printed form for sighted users.

**Verification** Re-test with NVDA and JAWS: every field must announce its label and type; Tab order must follow the visual order; PAC 2024 must report zero 25-xxx / 28-xxx failures.

### F-03 Route maps and service diagrams have no text alternative

|                 |                                                                                                                                                                          |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>CRITICAL</b> Pages: 6, 7, 8, 9, 21 · Area: Images · Fix in: Source (InDesign) — Object Export Options · Effort: Medium — approx. 2 hours writing and 1 hour placement |
| Criteria failed | <b>WCAG 2.1:</b> 1.1.1 Non-text Content (A) <b>Section 508:</b> 502.3.1; E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.3 (Matterhorn 13-004)                                   |

**What we found** Five informative figures — the four route maps (Routes 1, 3, 7 and 12) and the “How to use the fare card reader” diagram on page 21 — are tagged as Figure elements but have an empty /Alt string (“ ”). Two further Figures (page 6 legend, page 9 inset) have no /Alt key at all. No extended description is provided anywhere in the document for the maps.

**How we confirmed it** NVDA announces each map as “graphic, blank”. JAWS announces “graphic”. Acrobat Checker: “Figures alternate text — Failed” (7 instances). PAC 2024: 7 × Matterhorn 13-004.

**Real-world impact** The maps are the primary way the guide tells riders where each route goes and where it connects. A blind rider hears “graphic” seven times and learns nothing about the routes. Because the map information is not repeated in text anywhere else in the guide, this content is completely unavailable to screen-reader users, and it is also lost for users of reflow and text-to-speech tools with low vision.

**Remediation** Fix in the source (InDesign) so the alt text survives future exports. For each map write a concise alt text (“Map of Route 7 between Harbor Station and Meridian Mall”) and add a short text description of the route — the sequence of major stops and transfer points — as a normal paragraph or list beneath the map. That text serves everyone and removes the need for a long alt attribute. The card-reader diagram on page 21 can be described fully in alt text (“Fare card is tapped flat against the green reader panel below the display; a single beep confirms payment”). Purely decorative page-corner graphics should be artifacted (see F-14).

**Verification** Each Figure reads a meaningful description in NVDA; PAC reports zero 13-004 failures; route stop lists are present in the tag tree as L/LI.

### F-04 Fare and schedule tables lack header cells and header associations

|                 |                                                                                                                                                           |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>CRITICAL</b> Pages: 10, 11, 18, 19 · Area: Tables · Fix in: Source (InDesign) + PDF touch-up (Acrobat Table Editor) · Effort: Medium — approx. 3 hours |
| Criteria failed | <b>WCAG 2.1:</b> 1.3.1 Info and Relationships (A) <b>Section 508:</b> 502.3.3; E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.5 (Matterhorn 15-003, 15-005)      |

**What we found** Six data tables are tagged as Table, but all cells — including the two header rows in the fare table on page 10 and the first column of stop names in the schedule tables on pages 18–19 — are tagged TD. No cell carries a /Scope attribute or a /Headers array. The page 10 fare table uses a two-level column header

(“Full fare / Reduced fare” under “Single ride”, “Day pass”, “Monthly pass”) and merged cells with no ColSpan attribute. Row 14 of the page 11 table is an empty spacer row.

**How we confirmed it** NVDA table navigation (Ctrl+Alt+arrows) reads the cell value only, e.g. “\$1.25”, with no column or row context. Acrobat Checker: “Table headers — Failed” (6), “Regularity — Failed” (2). PAC 2024: 6 × 15-003 (no TH), 2 × 15-005 (irregular table).

**Real-world impact** A screen-reader user navigating the fare table hears a sequence of dollar amounts with no way to know which is the reduced fare for a day pass and which is the full fare for a monthly pass. In the schedule tables, times are read without the stop name, so the user cannot tell when the bus arrives at their stop. Pricing and timetable information is exactly the information riders open this guide for, and it is unusable for this audience.

**Remediation** Fix in the source. In InDesign, convert the first row(s) to Header Rows in Table Options and, for the schedule tables, set the first column as a header column; regenerate. Then, in the PDF, use the Table Editor to set Scope = Column on the top header rows and Scope = Row on the stop-name column, add ColSpan/RowSpan to merged cells, and give the two-level headers on page 10 explicit /Headers IDs. Remove the empty spacer row on page 11 or artifact it.

**Verification** NVDA announces column and row headers when moving between cells; PAC reports zero 15-xxx failures; no empty rows remain in the structure.

## F-05 Document language is not set; Spanish section is not marked

|                        |                                                                                                                                                                     |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Severity</b>        | <b>HIGH</b> Pages: Whole document; 20–22 · Area: Language · Fix in: Source (InDesign) or PDF (Acrobat) · Effort: Low — under 1 hour                                 |
| <b>Criteria failed</b> | <b>WCAG 2.1:</b> 3.1.1 Language of Page (A); 3.1.2 Language of Parts (AA) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.2 (Matterhorn 11-001, 11-006) |

**What we found** The document catalog has no /Lang entry and the StructTreeRoot carries no default language. The Spanish-language summary “Guía del pasajero” on pages 20–22 has no /Lang attribute on any of its structure elements.

**How we confirmed it** NVDA with automatic language switching enabled reads the whole document with the English synthesizer; the Spanish pages are read with English pronunciation rules and are unintelligible. Acrobat Checker: “Primary language — Failed”. PAC 2024: 11-001 (no document language), 11-006 for 41 elements.

**Real-world impact** Screen readers choose the speech synthesizer from the document language. Without it, the reader falls back to the user’s default, and a Spanish-speaking blind rider who opens the Spanish section hears Spanish words mangled by an English voice. The guide was translated specifically to serve Spanish-speaking riders, and this one missing attribute makes that investment inaccessible to those who rely on speech.

**Remediation** Fix in the source and confirm in the PDF. Set the document language to English (en-US) in the InDesign export dialog (or in Acrobat: File › Properties › Advanced › Language). Apply a Spanish character style / paragraph style with Language = Spanish to pages 20–22 so InDesign exports /Lang (es) on those elements; alternatively set the language on the Sect element that wraps pages 20–22 in the Tags panel.

**Verification** Document Properties shows Language: English; NVDA switches voice automatically on page 20; PAC reports zero 11-xxx failures.

## F-06 No document title; file name shown in the title bar

|                 |                                                                                                                                  |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>HIGH</b> Pages: Whole document · Area: Metadata · Fix in: Source (InDesign) or PDF (Acrobat) · Effort: Low — 10 minutes       |
| Criteria failed | <b>WCAG 2.1:</b> 2.4.2 Page Titled (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.1 (Matterhorn 06-003, 07-001) |

**What we found** The Info dictionary Title is empty and the XMP dc:title is absent. The viewer preference DisplayDocTitle is not set, so Acrobat and browsers show the file name “MCTA\_RG\_FY26\_v7\_FINAL2.pdf” as the window title.

**How we confirmed it** Opened in Acrobat Reader, Edge and Chrome: window title shows the file name. NVDA announces “MCTA underscore RG underscore FY26 underscore v7 underscore FINAL2 dot pdf document” when the document gains focus. Acrobat Checker: “Title — Failed”. PAC 2024: 06-003, 07-001.

**Real-world impact** The title is the first thing a screen-reader user hears when a document opens and it is how they tell documents apart when several are open. A version-numbered file name gives no clue that this is the Rider’s Guide, and it looks unprofessional to sighted users too.

**Remediation** Fix in the source: enter the title in File › File Info in InDesign (“Meridian County Transit Authority — Rider’s Guide and Reduced-Fare Application, FY 2026”) and export with “Display Document Title” enabled. Can also be fixed in Acrobat under File › Properties › Description and Initial View.

**Verification** Window title shows the document title in Acrobat and in a browser; PAC reports zero 06-003 / 07-001.

## F-07 Heading levels skip and several section titles are not tagged as headings

|                 |                                                                                                                                                                             |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>HIGH</b> Pages: 3, 4, 5, 12, 13, 20 · Area: Structure · Fix in: Source (InDesign) — Export Tagging in paragraph styles · Effort: Low — approx. 1 hour                    |
| Criteria failed | <b>WCAG 2.1:</b> 1.3.1 Info and Relationships (A); 2.4.6 Headings and Labels (AA) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.4 (Matterhorn 14-002, 14-003) |

**What we found** The cover title is tagged H1 and chapter titles H2, but the sub-section titles on pages 4–5 (“Planning your trip”, “Paying your fare”) are tagged H4, skipping H3. The six sidebar titles on pages 12–13 and the Spanish section title on page 20 are tagged P with bold formatting. The sub-headings “Weekday service” and “Weekend service” on page 13 are tagged H6.

**How we confirmed it** NVDA elements list (Insert+F7 › Headings) shows a hierarchy that jumps from H2 to H4 and H6 and omits the sidebars and the Spanish section entirely. PAC 2024: 5 × 14-003 (heading level skipped). Acrobat Checker: “Appropriate nesting — Failed”.

**Real-world impact** Screen-reader users navigate long documents by jumping between headings and by reading the headings list, the same way sighted users scan the page. Skipped levels make the hierarchy confusing, and untagged titles mean the sidebars and the entire Spanish section do not appear in the headings list at all — a Spanish-speaking user cannot find their section by heading navigation.

**Remediation** Fix in the source. Map InDesign paragraph styles to export tags consistently: Chapter title → H1 (cover title becomes the document title, see F-06), Section → H2, Sub-section → H3, Sidebar title → H3, and remove the stray H4/H6 mappings. Give the Spanish section title its own style mapped to H1 or H2. Re-export.

**Verification** Headings list reads a clean H1 › H2 › H3 outline with no skipped levels; every visible title is in the list; PAC reports zero 14-xxx failures.

## F-08 Reading order interleaves columns and sidebars

|                 |                                                                                                                                       |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>HIGH</b> Pages: 4, 5, 12, 13 · Area: Reading order · Fix in: Source (InDesign) — Articles panel · Effort: Low — approx. 1 hour     |
| Criteria failed | <b>WCAG 2.1:</b> 1.3.2 Meaningful Sequence (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.1, 7.2 (Matterhorn 09-001) |

**What we found** On the two-column pages 4–5 and 12–13 the structure tree follows the InDesign story order in which the sidebars were created, not the visual order. The sidebar “Did you know? Bikes ride free” on page 5 is inserted between two sentences of the “Paying your fare” paragraph; on page 12 the “Holiday service” sidebar appears before the section title it belongs to.

**How we confirmed it** Read the pages linearly with NVDA (Say All): the sidebar interrupts a sentence mid-clause. Acrobat › Reading Order panel confirms the anomaly. Reflow view (Ctrl+4) shows the same sequence.

**Real-world impact** Users of screen readers, reflow and read-aloud tools receive the text in whatever order the tag tree dictates. Here a sentence about how to pay a fare is interrupted by an unrelated aside about bicycles, and a holiday-service notice is read before the reader knows what section they are in. The content is present but arrives scrambled, which is confusing at best and misleading at worst.

**Remediation** Fix in the source. In InDesign use the Articles panel to define the read order for each page (main story first, sidebars after the paragraph they relate to) and enable “Use for Reading Order in Tagged PDF”. Anchor sidebar frames to the paragraph they belong with. Re-export. Can be corrected in Acrobat by moving elements in the Tags panel, but it will need to be redone after every export.

**Verification** Say All in NVDA reads each page in the intended sequence; sidebars are read as complete units after their parent paragraph.

## F-09 Bulleted and numbered lists are not tagged as lists

|                 |                                                                                                                                             |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>HIGH</b> Pages: 5, 12, 15, 19, 22 · Area: Structure · Fix in: Source (InDesign) — paragraph styles · Effort: Low — approx. 1 hour        |
| Criteria failed | <b>WCAG 2.1:</b> 1.3.1 Info and Relationships (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.6 (Matterhorn 16-001, 16-002) |

**What we found** Nine lists (seven bulleted, two numbered) are tagged as consecutive P elements, with the bullet or number as ordinary text at the start of each paragraph. The 4-step “How to apply” list on page 15 and the eligibility criteria on page 15 are the most important instances. No L, LI, Lbl or LBody elements exist in the document.

**How we confirmed it** NVDA does not announce “list with N items” and does not allow list navigation (L key). Acrobat Checker: “List items — Failed” is not triggered because there are no lists to check; the issue is visible in the Tags panel. PAC 2024: flags 8 × 16-002 where bullet glyphs (●) from the Wingdings font sit inside P.

**Real-world impact** Screen readers tell users when a list begins and how many items it has, which is how a user knows that “How to apply” has four steps and that they have heard them all. Without list structure, the steps are just paragraphs that happen to begin with a number, and the bullet glyph is read as “bullet” or, for the Wingdings glyphs, as a garbled character.

**Remediation** Fix in the source. Apply InDesign’s native Bullets and Numbering to the list paragraph styles (instead of typed bullet characters) and ensure the styles map to “Automatic” or List export tags. Re-export; InDesign will create L/LI/Lbl/LBody automatically.

**Verification** NVDA announces “list with 4 items” on page 15; every list appears as L in the Tags panel; PAC reports zero 16-xxx failures.

## F-10 Hyperlinks are not tagged and several use non-descriptive text

|                 |                                                                                                                                                                             |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>MEDIUM</b> Pages: 2, 3, 17, 23, 24 · Area: Links · Fix in: Source (InDesign) — Hyperlinks panel; copy edit · Effort: Low — approx. 1.5 hours                             |
| Criteria failed | <b>WCAG 2.1:</b> 2.4.4 Link Purpose (In Context) (A); 1.3.1 Info and Relationships (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.18.5 (Matterhorn 28-011) |

**What we found** 14 link annotations exist (web addresses, e-mail addresses and the phone number on page 24) but none is enclosed in a Link structure element with an OBJR. Four links on pages 3 and 23 use the text “click here” or “here”. The e-mail link on page 17 has a /Contents entry, the others do not. The QR code on page 24 has no alt text and no printed URL beside it.

**How we confirmed it** NVDA links list (Insert+F7 › Links) is empty. Tab key does move through the annotations in Acrobat, but each is announced as “link” with no name. PAC 2024: 14 × 28-011.

**Real-world impact** Keyboard and screen-reader users often navigate a document by its links list. Here the list is empty, and when the user does land on a link by tabbing, they hear only “link” and cannot tell whether it goes to the trip planner, the fare-card portal or an e-mail address. “Click here” gives no purpose even when it is tagged.

**Remediation** Fix mostly in the source. Create hyperlinks with InDesign’s Hyperlinks panel (which exports Link tags) rather than adding them in Acrobat. Rewrite “click here” as descriptive text (“Plan your trip on the MCTA trip planner”). Print the URL next to the QR code and give the QR code alt text (“QR code linking to mcta.example.gov/reduced-fare”).

**Verification** Links list shows 14 descriptive entries; every Link tag contains an OBJR; PAC reports zero 28-011.

## F-11 Insufficient color contrast for captions, footnotes and map labels

|                 |                                                                                                                                                 |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>MEDIUM</b> Pages: 4, 6–9, 10, 11, 16, 24 · Area: Color · Fix in: Source (InDesign) — swatches and styles · Effort: Low — approx. 1 hour      |
| Criteria failed | <b>WCAG 2.1:</b> 1.4.3 Contrast (Minimum) (AA) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> Not a PDF/UA-1 requirement (WCAG only) |

**What we found** Three text styles fail the 4.5:1 minimum for normal-size text: figure captions in 60% gray on white (#9A9A9A, 2.7:1, 8 pt) on pages 4–9; footnotes in the same gray (2.7:1, 7.5 pt) on pages 10–11 and 16; and the white 8 pt stop labels on the light-green Route 3 line (#7BC67E, 2.1:1) on pages 6–7. The form field instruction text on page 16 (“Optional” in light orange #F6A54A on white, 2.3:1) also fails.

**How we confirmed it** Measured with TPGi Colour Contrast Analyser from the rendered PDF at 100%. Acrobat and PAC do not test contrast; this is a manual check.

**Real-world impact** Around one in twelve men has a color-vision deficiency and a much larger group — older riders in particular, which is the core audience of the reduced-fare program — has reduced contrast sensitivity. For them the captions and footnotes (which contain the exceptions to fare rules) fade into the page, and the stop labels on the Route 3 map are effectively invisible.

**Remediation** Fix in the source. Change caption and footnote swatches to a gray no lighter than #767676 (4.5:1) or use the body text color; put a dark backing plate behind map stop labels or move the labels off the route line; change the orange instruction text to the dark body color and rely on the word “Optional” rather than color.

**Verification** All text sampled with CCA meets 4.5:1 (or 3:1 for text 18 pt+ / 14 pt bold+).

## F-12 Color alone indicates “no service” in the schedule tables and route status

|                        |                                                                                                                                          |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Severity</b>        | <b>MEDIUM</b> Pages: 13, 18, 19 · Area: Color · Fix in: Source (InDesign) · Effort: Low — approx. 1 hour                                 |
| <b>Criteria failed</b> | <b>WCAG 2.1:</b> 1.4.1 Use of Color (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> Not a PDF/UA-1 requirement (WCAG only) |

**What we found** In the schedule tables (pages 18–19), time slots with no service are shown as red-shaded empty cells; the holiday calendar on page 13 shows reduced-service days in orange and no-service days in red, with no symbol or text. The route legend on page 6 distinguishes the four routes by color only.

**How we confirmed it** Viewed in grayscale (Acrobat Output Preview, simulated) and with a deuteranopia simulator: the red and orange calendar days are indistinguishable from each other; empty red cells look identical to empty white cells. Screen readers read the empty cells as “blank”.

**Real-world impact** A color-blind rider looking at the holiday calendar cannot tell a reduced-service day from a no-service day and may wait for a bus that is not coming. A screen-reader user gets no information at all from a shaded empty cell. The distinction matters most on exactly the days when service is unusual.

**Remediation** Fix in the source. Add a text token in each affected cell (“—” with a legend entry “— = no service”, or the words “No service”); add a letter or symbol to the calendar days (R for reduced, N for none); label route lines with their route number at intervals along the line as well as in the legend.

**Verification** Every meaning conveyed by color is also conveyed by text or a symbol; the tables read correctly in NVDA.

## F-13 No bookmarks in a 24-page document

|                        |                                                                                                                                                                                            |
|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Severity</b>        | <b>MEDIUM</b> Pages: Whole document · Area: Navigation · Fix in: Source (InDesign) or PDF (Acrobat) · Effort: Low — 15 minutes after F-07                                                  |
| <b>Criteria failed</b> | <b>WCAG 2.1:</b> 2.4.5 Multiple Ways (AA) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.17 (bookmarks, if present, must reflect structure); Acrobat checker rule “Bookmarks” |

**What we found** The document contains no Outlines dictionary. The only navigation aid is the untagged table of contents on page 2 (see F-17).

**How we confirmed it** Bookmarks panel is empty in Acrobat and in browser viewers. Acrobat Checker: “Bookmarks — Failed” (documents over 21 pages).

**Real-world impact** Bookmarks are the fastest way for keyboard, screen-reader and screen-magnifier users to move to a section without paging through the whole document. Their absence is a barrier for magnifier users in particular, for whom scrolling 24 pages at 400% zoom to find the fare table is slow and disorienting.

**Remediation** Fix in the source: enable “Create bookmarks from TOC” or use InDesign’s Bookmarks panel; once the heading structure is fixed (F-07), bookmarks can also be generated in Acrobat from the tag structure in under 5 minutes.

**Verification** Bookmarks panel lists every H1/H2 and each bookmark opens the correct page.

## F-14 Decorative graphics and page furniture are in the content tree instead of being artifacts

|                 |                                                                                                                                                                                   |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>MEDIUM</b> Pages: All pages · Area: Structure · Fix in: Source (InDesign) — master pages and Object Export Options · Effort: Low–Medium — approx. 2 hours                      |
| Criteria failed | <b>WCAG 2.1:</b> 1.1.1 Non-text Content (A); 1.3.2 Meaningful Sequence (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.1, 7.3 (Matterhorn 01-005, 01-006, 13-005) |

**What we found** Each page has a green header bar, a swoosh graphic on the cover and chapter openers, and dotted rule lines between table rows. These are tagged as empty Figure elements (38 instances) or sit as untagged path content (112 instances) rather than being marked as Artifact. The photograph on the cover has the alt text “Image” and the decorative icon set on page 3 (eight icons) has alt text copied from the file names (“icon\_bus\_v3.ai”).

**How we confirmed it** NVDA announces “graphic” repeatedly on every page, and “graphic icon underscore bus underscore v3 dot ai” on page 3. PAC 2024: 38 × 13-005 (Figure without meaning), 112 × 01-006 (untagged content). Acrobat Checker: “Tagged content — Failed” (112).

**Real-world impact** A screen-reader user hears “graphic” up to six times per page for elements that carry no information, which is fatiguing and makes them doubt whether they are missing something. File-name alt text is worse than none: it is read out in full and means nothing to the listener.

**Remediation** Fix in the source. In InDesign, apply Object Export Options › Alt Text › “Decorative” — or place page furniture on the master page, which exports as artifact automatically. Rewrite the cover photo alt text (“A rider in a wheelchair boards a low-floor MCTA bus using the front ramp”) and give the page 3 icons either meaningful alt text or mark them decorative where the adjacent heading already carries the meaning.

**Verification** PAC reports zero 01-006 / 13-005; NVDA reads no “graphic” announcements except the informative figures.

## F-15 Footnotes are not structurally associated with their references

|                 |                                                                                                                                             |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>MEDIUM</b> Pages: 10, 11, 16 · Area: Structure · Fix in: Source (InDesign) — native footnotes · Effort: Low — approx. 1 hour             |
| Criteria failed | <b>WCAG 2.1:</b> 1.3.1 Info and Relationships (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.9 (Matterhorn 19-003, 19-004) |

**What we found** Seven footnotes on the fare pages and the application page are tagged as P at the end of the page. Reference markers in the body (“1”, “2”) are superscript text runs with no Reference tag or Link, and there is no Note element. Footnote 3 on page 11 (“Reduced fare requires a valid MCTA Reduced-Fare ID card”) is the key eligibility condition.

**How we confirmed it** NVDA reads the reference marker as “1” inline with no indication that a note exists, and reads the footnote text at the end of the page with no association. PAC 2024: 7 × 19-003.

**Real-world impact** Footnotes in this guide carry the exceptions — who qualifies for the reduced fare, which passes are not valid on express routes. A screen-reader user hears a stray digit in the middle of a sentence and, a page later, an unattached sentence beginning “Reduced fare requires...”. The condition is easy to miss entirely.

**Remediation** Fix in the source. Use InDesign’s native footnote feature (Type › Insert Footnote) instead of typed superscripts; recent InDesign versions export Note elements with Reference links. Alternatively, in the PDF, wrap each marker in a Reference tag with a Link to the Note and tag each footnote as Note with a Lbl.

**Verification** Each marker is a Reference/Link that jumps to its Note; PAC reports zero 19-xxx failures.

## F-16 Running headers, footers and page numbers are read as content

|                 |                                                                                                                                          |
|-----------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>MEDIUM</b> Pages: All pages · Area: Structure · Fix in: Source (InDesign) — parent pages · Effort: Low — 30 minutes                   |
| Criteria failed | <b>WCAG 2.1:</b> 1.3.2 Meaningful Sequence (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.8 (Matterhorn 18-001, 18-002) |

**What we found** The running header “MCTA Rider’s Guide FY 2026” and the footer with page number and website are tagged as P on every page (48 elements). They are not marked as Pagination artifacts.

**How we confirmed it** NVDA reads “MCTA Rider’s Guide FY 2026” at the start of every page and “Page 7 mcta dot example dot gov” at the end, interrupting paragraphs that continue across pages. PAC 2024: 48 × 18-001.

**Real-world impact** Running headers and footers interrupt the flow of reading every time a page turns — in this guide, mid-sentence in at least nine places. It is the equivalent of someone reading a document aloud and reciting the header and footer between every page.

**Remediation** Fix in the source. Move the header and footer elements to the InDesign master (parent) page; master-page items export as artifacts. Nothing else needs to change.

**Verification** Header/footer text absent from the Tags panel; NVDA Say All is uninterrupted across page breaks; PAC reports zero 18-xxx.

## F-17 Table of contents is not tagged as TOC and entries are not linked

|                 |                                                                                                                                                                       |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>LOW</b> Pages: 2 · Area: Navigation · Fix in: Source (InDesign) · Effort: Low — 30 minutes                                                                         |
| Criteria failed | <b>WCAG 2.1:</b> 2.4.5 Multiple Ways (AA); 1.3.1 Info and Relationships (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.7 (Matterhorn 17-001, 17-003) |

**What we found** The TOC on page 2 is tagged as 14 P elements with dot leaders as typed periods. Entries are not TOC/TOCI and there are no link annotations to the target pages.

**How we confirmed it** NVDA reads each entry as text including a long string of “dot dot dot”; entries cannot be activated. PAC 2024: 17-001.

**Real-world impact** The TOC is currently the only navigation aid in the document and it does not work as one for keyboard or screen-reader users: they can hear the entries but cannot jump to them. The typed dot leaders add several seconds of “dot dot dot” to each line.

**Remediation** Fix in the source. Generate the TOC with InDesign’s Table of Contents feature (Layout › Table of Contents) with “Create PDF Bookmarks” enabled; it exports TOC/TOCI structure with links and real tab leaders.

**Verification** TOC entries appear in the links list and jump to the correct page; leaders are not read aloud.

## F-18 Metadata incomplete: no PDF/UA identifier, author and subject fields unhelpful

|                 |                                                                                                                                         |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>LOW</b> Pages: Whole document · Area: Metadata · Fix in: PDF (Acrobat) — last step · Effort: Low — 15 minutes                        |
| Criteria failed | <b>WCAG 2.1:</b> — (not a WCAG failure) <b>Section 508:</b> — <b>PDF/UA-1:</b> 5 (Conformance), 7.1 (Matterhorn 06-001, 06-002, 06-004) |

**What we found** The XMP metadata stream has no pdfuaid:part identifier. Author reads “jsmith”, Subject is empty, Keywords are empty, and the Producer string shows the file was post-processed by a compression tool that stripped the XMP packet InDesign wrote.

**How we confirmed it** Inspected with Acrobat Document Properties and a structural dump. PAC 2024: 06-001 (no PDF/UA identifier), 06-002 (XMP and Info Title mismatch).

**Real-world impact** No direct impact on a rider, but the missing identifier means the document can never be reported as PDF/UA conformant by automated checkers, and the compression step will silently undo remediation work if it is repeated after the fixes.

**Remediation** Fix in the PDF as the final step of remediation: set Author to “Meridian County Transit Authority”, add a one-line Subject, add the PDF/UA-1 identifier (Acrobat › Preflight › “Set PDF/UA-1 entry” or in the XMP), and remove the compression tool from the workflow or run it before tagging, never after.

**Verification** PAC reports zero 06-xxx failures and shows the PDF/UA-1 identifier.

## F-19 One font is not embedded and one lacks a Unicode mapping

|                 |                                                                                                                                                        |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severity        | <b>LOW</b> Pages: 6–9, 3 · Area: Fonts · Fix in: Source (InDesign / GIS export) · Effort: Low — 1 hour                                                 |
| Criteria failed | <b>WCAG 2.1:</b> 1.3.1 Info and Relationships (A) <b>Section 508:</b> E205.4 (WCAG 2.0 AA) <b>PDF/UA-1:</b> 7.21.3, 7.21.6 (Matterhorn 31-006, 31-009) |

**What we found** The map label font “Helvetica” is referenced but not embedded (the maps were placed as PDFs exported from a GIS tool). The Wingdings glyphs used for bullets (see F-09) and the icon font on page 3 have no ToUnicode CMap, so their characters cannot be mapped to text.

**How we confirmed it** Document Properties › Fonts lists Helvetica as “Not embedded”. Copying the page 3 icon row yields “”. Acrobat Checker: “Character encoding — Failed” (2 fonts). PAC 2024: 31-006, 31-009.

**Real-world impact** A non-embedded font renders differently on each system and may substitute in a way that shifts map labels; a missing Unicode mapping means text-to-speech and copy-paste produce garbage for those characters. Both conditions are hard failures for PDF/UA even when the visual document looks correct.

**Remediation** Fix in the source: re-export the maps with fonts embedded (or outline the labels in the GIS export and rely on the new text descriptions from F-03); replace the Wingdings bullets with native InDesign bullets (F-09); export the page 3 icons as graphics with alt text rather than as an icon font.

**Verification** All fonts embedded (subset) in Document Properties; PAC reports zero 31-xxx failures.

## 7. Remediation roadmap

The fastest route to a conformant document is to fix the InDesign file first and export once, then finish the parts that only exist in the PDF. Fixing everything in Acrobat would be quicker for this one file but would have to be repeated every time the guide is updated — and MCTA reissues this guide every fiscal year.

### 7.1 Phases

| Phase       | What happens                                                                                         | Findings addressed | Effort | Who   |
|-------------|------------------------------------------------------------------------------------------------------|--------------------|--------|-------|
| 0 · Unblock | Remove the security restriction, set the title and language. Re-publish the interim file immediately | F-01, F-05, F-06   | < 1 h  | Taika |

| Phase            | What happens                                                                                                                                                                                                                                                                                                           | Findings addressed                                                     | Effort | Who                                         |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|--------|---------------------------------------------|
|                  | so screen-reader users can at least read the current guide while the rest is fixed.                                                                                                                                                                                                                                    |                                                                        |        |                                             |
| 1 · Source fixes | Correct the InDesign document: style-to-tag mapping, native lists and footnotes, Articles panel reading order, parent-page furniture, object export options (alt text, decorative), table header rows, color swatches, color-independent cues, hyperlinks panel, TOC generation, font embedding. Re-export tagged PDF. | F-03, F-07, F-08, F-09, F-10, F-11, F-12, F-14, F-15, F-16, F-17, F-19 | ≈ 14 h | Taika (or MCTA designer with our checklist) |
| 2 · PDF layer    | On the re-exported file: build the form (names, tooltips, Form/OBJR tags, export values, tab order), table header scope and spans, verify Link tags, generate bookmarks, set PDF/UA identifier and metadata.                                                                                                           | F-02, F-04, F-10, F-13, F-18                                           | ≈ 8 h  | Taika                                       |
| 3 · Verification | Re-run Acrobat Checker and PAC 2024, repeat the Appendix D protocol with NVDA and JAWS, keyboard pass, contrast re-check; issue a verification statement and an updated scorecard.                                                                                                                                     | All                                                                    | ≈ 4 h  | Taika                                       |

## 7.2 Preventing regression

Three process changes keep the guide accessible in future years at almost no cost: save the accessibility settings (title, language, tagging, “Display document title”) in the InDesign export preset; run the compression tool before tagging or not at all, because it strips metadata (F-18); and add a five-minute check (Acrobat Checker plus a quick NVDA read of page one and the form) to the sign-off checklist. We include a one-page export checklist with every remediation delivery.

## 8. What already works

An audit report naturally concentrates on problems, but it is worth recording what MCTA has already done right, because these are the things that make the remediation estimate modest rather than a rebuild.

- **Genuine text, not a scan.** The document is a true text PDF exported from InDesign; no OCR or recreation is needed.
- **Already tagged.** InDesign exported a structure tree with 1,112 elements. Most paragraphs, the chapter headings and all six tables are recognized as such; the work is correcting the structure, not creating it.
- **Body text contrast is excellent.** Body copy is #333333 on white (12.6:1) at 10.5 pt, and headings are dark green on white (5.9:1). Only captions, footnotes and map labels fall short.
- **Fields are keyboard-operable.** All 31 form fields can be reached and operated from the keyboard, and focus is visible. Once they are labeled and ordered, the form will work.
- **Clear, plain-language writing.** Sentences are short and the eligibility rules are stated once, in one place — which is good for every reader and makes the heading and list fixes straightforward.

- **Source files available.** MCTA supplied the InDesign package on request, which allows source-first remediation and a lower long-term cost.

## Appendix A. WCAG 2.1 Level A/AA checklist

All 50 Level A and AA success criteria of WCAG 2.1 were assessed. Result: 13 pass, 15 fail, 22 not applicable. The table lists the 28 applicable criteria; the 22 criteria that concern content types absent from this document (time-based media, timing, motion, pointer gestures, status messages, input purpose, text spacing, hover content, error handling in submitted forms, parsing) are: 1.2.1, 1.2.2, 1.2.3, 1.2.4, 1.2.5, 1.3.4, 1.3.5, 1.4.2, 1.4.12, 1.4.13, 2.1.4, 2.2.1, 2.2.2, 2.5.1, 2.5.2, 2.5.3, 2.5.4, 3.3.1, 3.3.3, 3.3.4, 4.1.1, 4.1.3.

| SC     | Success criterion                | Level | Result | Findings / notes                                                        |
|--------|----------------------------------|-------|--------|-------------------------------------------------------------------------|
| 1.1.1  | Non-text Content                 | A     | Fail   | F-03, F-14                                                              |
| 1.3.1  | Info and Relationships           | A     | Fail   | F-02, F-04, F-07, F-09, F-10, F-15, F-17, F-19                          |
| 1.3.2  | Meaningful Sequence              | A     | Fail   | F-08, F-14, F-16                                                        |
| 1.3.3  | Sensory Characteristics          | A     | Pass   | Instructions do not rely on shape or position alone                     |
| 1.4.1  | Use of Color                     | A     | Fail   | F-12                                                                    |
| 1.4.3  | Contrast (Minimum)               | AA    | Fail   | F-11                                                                    |
| 1.4.4  | Resize Text                      | AA    | Pass   | Text zooms to 200% without loss; reflow depends on tagging (see 1.4.10) |
| 1.4.5  | Images of Text                   | AA    | Pass   | Map labels are text; no images of text used for body content            |
| 1.4.10 | Reflow                           | AA    | Pass   | Reflow works; order issues are covered under 1.3.2                      |
| 1.4.11 | Non-text Contrast                | AA    | Pass   | Field borders and route lines meet 3:1 against the page                 |
| 2.1.1  | Keyboard                         | A     | Pass   | All fields and links operable from the keyboard                         |
| 2.1.2  | No Keyboard Trap                 | A     | Pass   |                                                                         |
| 2.3.1  | Three Flashes or Below Threshold | A     | Pass   | Nothing flashes                                                         |
| 2.4.1  | Bypass Blocks                    | A     | Fail   | Headings and bookmarks are the PDF mechanism (PDF9); see F-07, F-13     |
| 2.4.2  | Page Titled                      | A     | Fail   | F-06                                                                    |
| 2.4.3  | Focus Order                      | A     | Fail   | F-02 (tab order)                                                        |
| 2.4.4  | Link Purpose (In Context)        | A     | Fail   | F-10                                                                    |
| 2.4.5  | Multiple Ways                    | AA    | Fail   | F-13, F-17 (no working bookmarks or TOC)                                |
| 2.4.6  | Headings and Labels              | AA    | Fail   | F-07 (missing/incorrect headings); F-02 (missing labels)                |
| 2.4.7  | Focus Visible                    | AA    | Pass   | Viewer default focus indicator visible on all fields                    |
| 3.1.1  | Language of Page                 | A     | Fail   | F-05                                                                    |

| SC    | Success criterion         | Level | Result | Findings / notes                        |
|-------|---------------------------|-------|--------|-----------------------------------------|
| 3.1.2 | Language of Parts         | AA    | Fail   | F-05 (Spanish section)                  |
| 3.2.1 | On Focus                  | A     | Pass   | No context change on focus              |
| 3.2.2 | On Input                  | A     | Pass   | No context change on input              |
| 3.2.3 | Consistent Navigation     | AA    | Pass   | Header/footer consistent (but see F-16) |
| 3.2.4 | Consistent Identification | AA    | Pass   |                                         |
| 3.3.2 | Labels or Instructions    | A     | Fail   | F-02                                    |
| 4.1.2 | Name, Role, Value         | A     | Fail   | F-01, F-02                              |

## Appendix B. PDF/UA-1 (Matterhorn Protocol) checkpoint summary

Matterhorn Protocol 1.1 organizes the requirements of ISO 14289-1 into 31 checkpoints and 136 failure conditions. The table lists the checkpoints relevant to this document with the failure conditions that were triggered (machine-checked by PAC 2024 unless marked “human”). Checkpoints 03, 04, 05, 08, 12, 22, 23, 24 and 27 concern content types not present in the document (e.g. Ruby/Warichu, mathematical content, media) and are omitted.

| CP | Checkpoint                         | Result | Failure conditions     | Findings                   |
|----|------------------------------------|--------|------------------------|----------------------------|
| 01 | Real content tagged; artifacts     | Fail   | 01-005, 01-006         | F-14, F-16                 |
| 02 | Role mapping                       | Pass   |                        | Standard InDesign role map |
| 06 | Metadata                           | Fail   | 06-001, 06-002, 06-003 | F-06, F-18                 |
| 07 | Dictionary (ViewerPreferences)     | Fail   | 07-001                 | F-06                       |
| 09 | Appropriate tags / structure order | Fail   | 09-001 (human)         | F-08                       |
| 10 | Character mappings                 | Fail   | 10-001                 | F-19                       |
| 11 | Declared natural language          | Fail   | 11-001, 11-006         | F-05                       |
| 13 | Graphics                           | Fail   | 13-004, 13-005         | F-03, F-14                 |
| 14 | Headings                           | Fail   | 14-002 (human), 14-003 | F-07                       |
| 15 | Tables                             | Fail   | 15-003, 15-005         | F-04                       |
| 16 | Lists                              | Fail   | 16-001, 16-002         | F-09                       |
| 17 | Table of contents                  | Fail   | 17-001, 17-003         | F-17                       |
| 18 | Pagination artifacts               | Fail   | 18-001, 18-002         | F-16                       |
| 19 | Notes and references               | Fail   | 19-003, 19-004         | F-15                       |
| 20 | Optional content                   | N/A    |                        | No optional content groups |
| 21 | Embedded files                     | N/A    |                        | None                       |

| CP | Checkpoint            | Result | Failure conditions | Findings   |
|----|-----------------------|--------|--------------------|------------|
| 25 | Annotations (general) | Fail   | 25-005, 25-012     | F-02, F-10 |
| 26 | Security              | Fail   | 26-001, 26-002     | F-01       |
| 28 | Form fields and links | Fail   | 28-004, 28-011     | F-02, F-10 |
| 29 | Digital signatures    | N/A    |                    | None       |
| 30 | XFA forms             | N/A    |                    | None       |
| 31 | Fonts                 | Fail   | 31-006, 31-009     | F-19       |

## Appendix C. Section 508 mapping

The 2017 Section 508 Refresh (36 CFR Part 1194) applies WCAG 2.0 Level A and AA to electronic content through E205.4, and adds the Chapter 5 software requirements that concern how a document exposes itself to assistive technology. A PDF that conforms to WCAG 2.1 AA and PDF/UA-1 will satisfy Section 508 for electronic documents; the reverse is not always true, which is why we audit against all three.

| 508 clause | Requirement                                                                            | Assessed via                                   | Result             |
|------------|----------------------------------------------------------------------------------------|------------------------------------------------|--------------------|
| E205.4     | Electronic content shall conform to WCAG 2.0 Level A and AA                            | Appendix A (WCAG 2.1 is a superset)            | Fail — 15 criteria |
| 502.2.2    | Platform accessibility features shall not be disrupted                                 | Security flags (F-01)                          | Fail               |
| 502.3.1    | Object information: role, state, properties, boundary, name, description exposed to AT | Form fields, figures, links (F-02, F-03, F-10) | Fail               |
| 502.3.2    | Modification of object information by AT                                               | Form fields editable with AT                   | Pass               |
| 502.3.3    | Row, column and headers of data cells exposed                                          | Tables (F-04)                                  | Fail               |
| 502.3.10   | Text content and attributes exposed                                                    | Fonts and character mapping (F-19)             | Fail               |

## Appendix D. Assistive-technology test protocol and results

Every audit includes the same task-based protocol, performed with NVDA and repeated with JAWS, reflecting what a real rider would try to do with this document. A task passes only when it can be completed independently and the information received is correct.

| # | Task                              | NVDA 2025 + Acrobat Reader | JAWS 2025 + Acrobat Reader | Result            |
|---|-----------------------------------|----------------------------|----------------------------|-------------------|
| 1 | Open the document and identify it | Announces “protected       | Same                       | Fail (F-01, F-06) |

| #  | Task                                                   | NVDA 2025 + Acrobat Reader                                                          | JAWS 2025 + Acrobat Reader | Result            |
|----|--------------------------------------------------------|-------------------------------------------------------------------------------------|----------------------------|-------------------|
|    | from what is announced                                 | document”; after removing security for testing, announces the file name             |                            |                   |
| 2  | List headings and jump to “Fares and passes”           | Headings list shows H2 “Fares and passes”; jump works; sub-headings missing/skipped | Same                       | Partial (F-07)    |
| 3  | Read page 4 continuously (Say All)                     | Sidebar interrupts a sentence; header/footer read at page turn                      | Same                       | Fail (F-08, F-16) |
| 4  | Find the reduced fare for a day pass in the fare table | Table navigation reads values with no headers; unable to identify the correct cell  | Same                       | Fail (F-04)       |
| 5  | Learn where Route 7 goes from the map                  | Announces “graphic, blank”                                                          | Announces “graphic”        | Fail (F-03)       |
| 6  | Hear the eligibility conditions in the footnotes       | Footnote text read as an unattached paragraph at page end                           | Same                       | Fail (F-15)       |
| 7  | Follow the link to the online trip planner             | Links list empty; tabbing reaches an unnamed “link”                                 | Same                       | Fail (F-10)       |
| 8  | Complete the reduced-fare application form             | All fields announced as “edit” / “check box”; checkbox group allows two selections  | Same                       | Fail (F-02)       |
| 9  | Read the Spanish summary on page 20                    | Read with English voice; unintelligible                                             | Same                       | Fail (F-05)       |
| 10 | Navigate using bookmarks                               | No bookmarks                                                                        | No bookmarks               | Fail (F-13)       |
| 11 | Navigate using the table of contents                   | Entries read with “dot dot dot”; not activatable                                    | Same                       | Fail (F-17)       |
| 12 | Operate every field and link with the keyboard only    | All reachable and operable; focus visible; order illogical on pages 14–17           | —                          | Partial (F-02)    |

Environment: Windows 11 Pro 24H2, Acrobat Reader / Acrobat Pro 2025.001, Firefox 142; macOS 15.6, Preview, Safari 18, VoiceOver; NVDA 2025.1 and JAWS 2025 at default settings (see Section 3.2). The owner password was removed on a working copy solely to allow structural testing after Task 1.

## Appendix E. Glossary

| Term                        | Meaning                                                                                  |
|-----------------------------|------------------------------------------------------------------------------------------|
| Alternative text (alt text) | A short text description of an image, stored in the PDF (the /Alt entry on a Figure tag) |

| Term                  | Meaning                                                                                                                                                 |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       | and read aloud by screen readers in place of the image.                                                                                                 |
| Matterhorn Protocol   | The PDF Association's checklist of 31 checkpoints and 136 failure conditions used to test conformance with PDF/UA-1.                                    |
| PDF/UA                | ISO 14289, the international standard for accessible PDF. PDF/UA-1 (2014) is the version required by most procurement; PDF/UA-2 (2024) targets PDF 2.0. |
| Structure tree / tags | The hidden hierarchy of elements (P, H1, Figure, Table, L, Link, Form...) that gives a PDF its semantics for assistive technology.                      |
| Tooltip (/TU)         | The description attached to a form field, read by screen readers as the field's label.                                                                  |

## Appendix F. Next steps and terms

### What happens next

1. We walk you through this report in a 30-minute call and answer questions about any finding.
2. You receive a fixed-price remediation quote covering Phases 0–3 of Section 7. If you accept within 60 days, the \$299 audit fee is credited in full against the remediation.
3. We remediate the InDesign source and the PDF, and return both, together with a verification statement, an updated scorecard, PAC and Acrobat reports, and a one-page export checklist for future editions.

### About this report

This report documents the conformance of the audited file against WCAG 2.1 Level AA, Section 508 and PDF/UA-1 as observed on the audit dates, using the tools and assistive technologies listed in Appendix D. It is a technical assessment and not a legal opinion; there is no such thing as an “ADA-certified” PDF, and no auditor can guarantee that a document will not be the subject of a complaint. What we can document is that the file meets the recognized technical standards, which is what procurement rules and most legal frameworks ask for. Findings are reported against the file as received; changes made after the audit dates are not covered.

### About Taika Translations

Taika Translations LLC is a veteran-owned translation, localization and document-accessibility company based in Austin, Texas. We remediate PDFs and forms to Section 508 and PDF/UA for federal, state and institutional clients, including multilingual documents where language tagging and translated alt text matter as much as structure, and we test with real assistive technology, not only checkers.

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