



AUTO ATTENDANT / RESEARCH & PRACTICAL GUIDANCE

Accessible Phone Menus: ADA, AODA and ACA Explained

Get a business phone number with a simple auto attendant menu from Auto Attendant. A caller picks who they need and the call rings that person's own mobile, so nobody on your team has to publish a personal number.

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The short answer

As of October 2026:

- **United States (ADA Title III).** If your business serves the public and uses an automated attendant or IVR, that system "must provide effective real-time communication" with people using TTYs and FCC-approved relay services, including Internet-based relay ([28 CFR 36.303\(d\)\(1\)](#)). You do not need your own TTY.
- **FCC Section 255** applies to providers of phone, VoIP, voicemail and interactive menu *services* and to equipment makers ([FCC, DA 26-190](#)). It is aimed at your phone provider, not at you.
- **Ontario (AODA).** Any organization with employees in Ontario must provide accessible customer service. Paperwork and reporting duties increase at 20 and 50 employees ([Ontario.ca](#)).
- **Federal Canada (Accessible Canada Act).** The Act covers federal bodies and businesses within Parliament's legislative authority. Most small businesses are outside it ([Accessible Canada Act, s. 7](#)).

None of these rules sets a timeout in seconds, a maximum number of options or a required "repeat" key. Those are design choices, and the checklist below covers them. This article is educational, not legal advice.

Why menu design is an accessibility question

A phone menu asks the caller to listen, remember, decide and press a key, often against a clock. Each of those steps can block someone:

- **Relay users** (deaf, hard-of-hearing or speech-disabled callers) have an operator in the middle who relays each prompt and enters each choice. Every step takes longer.
- **Callers with hearing aids** or in noisy places miss options and need them repeated.
- **Blind and low-vision callers** using a smartphone may have to take the phone away from their ear to find the keypad. A Missouri state IVR guideline asks for "an appropriate pause between menu items and between different menus" because cell phone users have to do this ([Missouri Office of Administration](#)).

- **Callers with memory or cognitive disabilities** struggle with long lists. The same guideline sets a maximum of five items, "because people cannot actually see the menu items."

The FCC's definition of an "accessible" interactive menu names these needs directly. It includes "operable without time-dependent controls," meaning at least one mode "that does not require a response time or allows a response to be by-passed or adjusted by the user over a wide range" ([47 CFR 7.3](#)). That definition binds providers, not you. It is still a useful design target.

What the ADA expects from a US small business on the phone

Title III covers "businesses and nonprofit organizations that serve the public" ([ADA.gov](#)). For phones, four points matter:

1. **Effective communication.** Businesses must provide auxiliary aids and services (such as TTYs) unless that would be an "undue burden," meaning "significant difficulty or expense" ([ADA.gov](#)).
2. **Relay calls.** "Covered entities are also required to accept telephone calls placed through TRS and VRS." The free nationwide relay service is reached by dialing 7-1-1 ([ADA.gov](#)). Relay calls must be answered "in the same manner" as other calls ([28 CFR 36.303\(d\)\(4\)](#)).
3. **Automated attendants.** If you use "an automated-attendant system, including, but not limited to, voicemail and messaging, or an interactive voice response system, for receiving and directing incoming telephone calls," it must provide effective real-time communication with TTY and relay users ([28 CFR 36.303\(d\)\(1\)](#)).
4. **No TTY required.** You may use relay services instead of direct communication, and you are not required "to use a TTY" ([28 CFR 36.303\(d\)\(3\)](#), [\(d\)\(5\)](#)).

The regulation does not say how to meet point 3: it sets no timeout, no option count and no key layout. The practical test is whether a relay user can get through your menu to the right person or voicemail box. A menu that hangs up after one silent pass is the kind of design that can fail.

FCC Section 255: who it actually binds

On February 25, 2026, the FCC issued Public Notice DA 26-190. It reminds covered entities that Section 255 applies to "any provider of telecommunications service, interconnected VoIP, voicemail, or interactive menu service," to equipment manufacturers, and to carriers ([FCC, DA 26-190](#)).

Duty	Who	Source
Make voicemail and interactive menus accessible and usable, "if readily achievable"	Providers of voicemail or interactive menu service; equipment manufacturers	47 CFR 7.5
Keep records of accessibility efforts	Covered providers and manufacturers	47 CFR 14.31(a)
File an annual certification by April 1 in the FCC's RCCC Registry	Covered providers and manufacturers	47 CFR 14.31(b)

A clinic or trades business that buys a number with a menu is the provider's customer. The notice is addressed to "service providers and equipment manufacturers," and nothing in it asks a business that only answers its own calls with a menu to file anything. Your duties as a business come from the ADA and from state or provincial law. Section 255 does give you a good question for a vendor: what accessibility features does your menu service have?

Ontario AODA: customer service rules for small employers

Under the Accessibility for Ontarians with Disabilities Act, 2005, you are exempt only "if you do not have employees in Ontario." Full-time, part-time, seasonal and contract workers count toward the thresholds. Volunteers and independent contractors do not ([Ontario.ca](https://www.ontario.ca)).

Every covered organization must provide customer service that lets people with disabilities access its goods and services. That includes "communicating in a manner that takes a person's disability into account," "providing notice of temporary disruptions," and accessible ways to give feedback ([Ontario.ca](https://www.ontario.ca)). The page does not mention telephones, but your main line is where much of that communication happens.

Duty	1 to 19 employees	20 to 49	50 or more
Accessible customer service policies	Required; documenting optional	Required; documenting optional	Documented, available in accessible format on request
Training	Required	Required	Required, with written records
Accessible feedback process	Required	Required	Required
Multi-year accessibility plan	Not listed	Not listed	Required, reviewed at least every five years
Compliance report	Not listed	Every three years	Every three years

Source: [Ontario.ca](https://www.ontario.ca), updated June 16, 2026. The current filing deadline for organizations with 20 or more employees is December 31, 2026.

What this means for your phone line:

- Use your closure prompt for "temporary disruption" notices: what is unavailable, and when it returns.
- Accept feedback by phone, and make voicemail easy to reach from the menu.
- Include relay calls in staff training.

We could not load the regulation itself (O. Reg. 191/11), so this section relies on the province's guidance.

Federal Canada: the Accessible Canada Act

The Act applies to federal government entities, certain Crown corporations, the Canadian Forces, and any organization that "carries on an undertaking or business that is within the legislative authority of Parliament" ([Accessible Canada Act](https://www.accessiblecanada.ca/act), s. 7(1)). Most retail, trades, clinic and professional-services businesses are provincially regulated and fall outside it.

Even for federally regulated businesses, the Accessible Canada Regulations exempt an entity with "an average of fewer than 10 employees" from the duties to publish accessibility plans, feedback processes and progress reports (sections 47-49, 56-58, 65-67 and 69-71 of the Act). The exemption ends in any year the average reaches 10 or more ([SOR/2021-241, s. 3](#)). CRTC telecom accessibility rules and provincial human rights codes are outside this article's scope.

Design checklist: timeouts, repeats and fallbacks

Practice	Why	Source
Say the destination first, then the key: "For billing, press 2"	The caller does not have to hold a number in memory	Missouri; NN/g #14
Keep each menu to 4 or 5 choices	Callers cannot see the list	NN/g #7
Accept a key at any time	No one has to sit through the whole prompt	NN/g #6
Offer a repeat key and a way back	USAGov lets callers "repeat the options or return to the previous menu" in each branch	NN/g #5; USAGov
Replay the menu on silence	A common pattern is "automatically repeating the menu options if the caller does not make a selection right away"	NN/g #4
Send repeated silence to a person or voicemail, never a hang-up	Some systems connect callers to a person after three playthroughs	NN/g #4
Leave pauses between options	Mobile callers move the phone to press keys	Missouri
One clear voice, plain words, same keys everywhere	Lowers memory load	Missouri

About timeouts. None of these sources gives a required number, and your platform may not let you set one. The safe pattern does not depend on it: on silence, replay the menu; if there is still no choice, route the call to a person or a shared voicemail box instead of ending it.

Sample menu:

"Thanks for calling Northside Dental. For appointments, press 1. For billing, press 2. To leave a message, press 3. To hear these options again, press 9."

(No key:) replay the options once.

(Still no key:) send the call to the general voicemail box.

More wording is in our [phone menu scripts for small business](#), and the research behind it is in [phone menu design evidence](#).

Handling relay and TTY callers on a menu system

United States. Relay users reach you through 7-1-1 or Internet-based and video relay ([ADA.gov](https://www.ada.gov)). Your menu plays to the operator, who relays it and enters the caller's choice.

Canada. Each carrier runs its own relay service. For example, Bell tells TTY users to dial 711, gives voice callers 1 800 855-0511, and says operators are available 24 hours a day. It also advises people calling organizations to give the operator the department, contact name and extension ([Bell](https://www.bell.ca)). Other carriers publish their own numbers.

Staff checklist:

1. Do not hang up on the relay introduction.
2. Speak to the caller, not the operator.
3. Pause after each question; relay adds delay.
4. Make voicemail and closed-hours messages say plainly what to do next.
5. Every few months, place a relay test call through the full path: menu, transfer, no answer, voicemail.

Our [relay call test for small-business phone menus](#) walks through the test.

FAQ

Am I legally required to have a TTY line? Under the ADA Title III regulation, no. You may use relay instead, but you must accept relay calls ([28 CFR 36.303\(d\)](#)).

Does my menu itself need to be accessible? In the US, a Title III business's automated attendant must communicate effectively with TTY and relay users ([28 CFR 36.303\(d\)\(1\)](#)). In Ontario, the duty to communicate in a way that takes disability into account covers customer service generally.

What is a reasonable timeout? No source we reviewed sets one. Design the menu so a slow response costs nothing: replay, then fall back to a person or voicemail.

Do I file anything with the FCC? The Section 255 certification falls on providers and manufacturers, not on businesses that only use a menu.

Auto Attendant menus use text-to-speech prompts, up to seven options, and voicemail by email with a transcript, which is enough for a short menu with a voicemail fallback.

Sources

1. [28 CFR 36.303](#), eCFR (DOJ ADA Title III rule): automated attendants and relay, no TTY required.
2. [ADA Requirements: Effective Communication](#), ADA.gov: Title III coverage, undue burden, relay calls, 7-1-1.
3. [Public Notice DA 26-190](#), FCC, February 25, 2026: who Section 255 covers; recordkeeping and certification.
4. [47 CFR part 7](#), eCFR: definition of "accessible"; provider and manufacturer duties.
5. [47 CFR 14.31](#), eCFR: records and annual April 1 certification.

6. [Accessibility rules for businesses and non-profits](#), Government of Ontario: AODA duties by size; December 31, 2026 deadline.
7. [Accessible Canada Act, s. 7](#), Justice Laws Website: who the Act applies to.
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9. [The UX of Phone-Tree Systems: 16 Usability Guidelines](#), Nielsen Norman Group, 2022: menu usability patterns.
10. [Press or Say 1](#), USAGov, 2020: repeat and back options.
11. [IVR Guidelines](#), Missouri Office of Administration, 2006: pauses, five-item limit, key after description.
12. [Bell TTY relay service](#), Bell Canada: 711, voice access number, hours.

Source links

Links cited in this article, in order of first appearance. Full addresses are provided for readers using extracted text.

1. <https://www.ecfr.gov/current/title-28/section-36.303>
2. <https://docs.fcc.gov/public/attachments/DA-26-190A1.txt>
3. <https://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits>
4. <https://laws-lois.justice.gc.ca/eng/acts/A-0.6/page-1.html>
5. <https://oa.mo.gov/sites/default/files/CC-Access-InteractiveVoiceRecognition-IVR-Guidelines112806.pdf>
6. <https://www.ecfr.gov/current/title-47/part-7>
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9. <https://laws-lois.justice.gc.ca/eng/regulations/SOR-2021-241/page-1.html>
10. <https://www.nngroup.com/articles/phone-tree-guidelines>
11. <https://www.usa.gov/blog/2020/03/press-or-say-1-usagov-expands-its-use-of-interactive-voice-response>
12. https://www.bell.ca/Accessibility_services/Bell_TTY_relay_service

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About Auto Attendant

Auto Attendant gives a small business one phone number and a recorded menu that sends each caller to the right person. The call rings the mobile that person already carries, using their normal dialler and their normal mobile plan. Pricing is a single flat monthly fee for the whole company rather than a charge for each user, and there is no app, desk phone or hardware to install.

One number, one menu, the phones you already own

A caller dials the business number, hears a short greeting and chooses an option. Each option can ring one mobile, ring several at once so whoever is free answers first, or try people one after another in a set order. There is no limit on how many people sit on the receiving end, because nobody is billed per seat. Setup is done by the owner in a few minutes: pick a number, write the greeting, and point each option at a mobile.

What it deliberately is not

An auto attendant routes a call; it does not answer one. Nobody at Auto Attendant speaks to callers, and no AI stands in for a receptionist. A business that wants its calls handled, messages taken and appointments booked wants an answering service, which is a different product at a different price. A business that needs call recording, queues, agent dashboards or CRM integration wants a contact centre platform. Auto Attendant is for the case where the call should simply reach the right pocket.

Keeping personal numbers off the internet

The business number is the only number a caller ever sees. Personal mobile numbers are never displayed and never given out, which is what lets an owner put a number on a website, an invoice, a van or a Google Business Profile without handing a personal line to everyone who finds it. An existing advertised number can be ported across and kept, and the old line keeps working while the port is in progress.

Work with Auto Attendant

Visit [Auto Attendant](#) to see [how it works](#), [how it compares](#) to a personal mobile, Google Voice and a full phone platform, and the current [pricing](#).

Telephone number portability, emergency calling and caller-ID rules differ by country and change over time. Articles published here describe general practice and cite primary regulator and carrier sources; they are not a guarantee of any timeline, and they are not legal or regulatory advice for a specific business.

Website: <https://autoattendant.io>

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