

Appendix B: Full, Itemized List of Evidence

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allyable

"Allyable creates software to make digital accessibility easier and faster for site owners. Our award-winning technology reduces the cost and complexity typically associated with making websites compliant with accessibility laws and guidelines." (<https://www.facebook.com/allyablesoftware/>)

Address: 1410 N 31st St, Philadelphia, PA 19147

Website: <https://allyable.com>

Evidence from Website

The company claims to "fix" accessibility violations in real time:

The screenshot shows the Allyable website's landing page for their digital accessibility solution. At the top, there is a large blue header with the text "360° DIGITAL ACCESSIBILITY SOLUTION". Below this, a sub-section titled "ALLYABLE OFFERS A FAST, EASY, AFFORDABLE APPROACH TO GLOBAL COMPLIANCE" is highlighted. To the right of this sub-section is a bulleted list of features:

- Automated, easy to install and low-code!
- Integrates seamlessly into your existing Agile workflow
- Monitors and fixes common [ADA](#) and [WCAG](#) 2.1+ violations in real time
- Innovative hybrid tool fills the gaps of accessibility development
- Complies with ISO 27001 and GDPR/CCPA

At the bottom of the page are two red call-to-action buttons: "GET STARTED NOW" and "WATCH VIDEO".

Figure 1: 360° Digital Accessibility Solution (Captured on October 21, 2021)

The company's FAQ claims that their product offers, "immediate remediation, continuous compliance, and built-in accessibility for existing digital content and assets in development,":

Why should I choose Allyable for my organization's website?

First, let us applaud you for choosing to build or update your website and other digital assets to be fully inclusive for all potential users, including the 1.85 billion people worldwide who live with disabilities. With 98% of existing websites out of compliance with accessibility regulations (ADA and WCAG 2.1+ standards), using our [Allyable360](#) solution to develop assets with accessibility in mind will vault you head and shoulders above most others in your industry.

There are numerous reasons your online assets need to be compliant: to make your products/services available to more people; to follow the law and avoid potential litigation; to increase your sales, and even to enhance your SEO performance and web page traffic. See [Compliance FAQs](#) for more details.

But why select our platform in particular? [Allyable](#) is all about doing well by doing right. Our company was co-founded by a successful business leader who experienced adult-onset hearing loss at the height of his career, which ignited a passion to make digital assets accessible to ALL people—especially those with disabilities, who are often overlooked by many online marketers. This purpose-fueled mission has driven us to develop the most complete, fastest, and simplest solution on the market, while remaining affordable for everyone from sole practitioners and small businesses to multinational corporations.

Our unique, revolutionary platform consists of several components that work together to provide a highly effective, technology-based approach to digital accessibility that incorporates artificial intelligence, machine learning, and image processing. This gives you a fast, easy solution for superior auditing, immediate remediation, continuous compliance, and built-in accessibility for existing digital content and assets in development—all in one place—saving you significant time and money.

The innovative digital accessibility platform developed by our team is far more effective than anything available on the market today. Yet it requires no special training, coding, or expensive consultation services to deploy—so anyone can design and maintain digital assets with accessibility in mind.

[See more about our products.](#)

Figure 2: Why should I choose Allyable? (Captured on October 21, 2021)

Allyable claims to be trusted by some big-name clients such as KPMG and Microsoft, but no evidence of this partnership appears to exist on the alleged clients' web presence, or the company uses another widget (i.e., Olo).

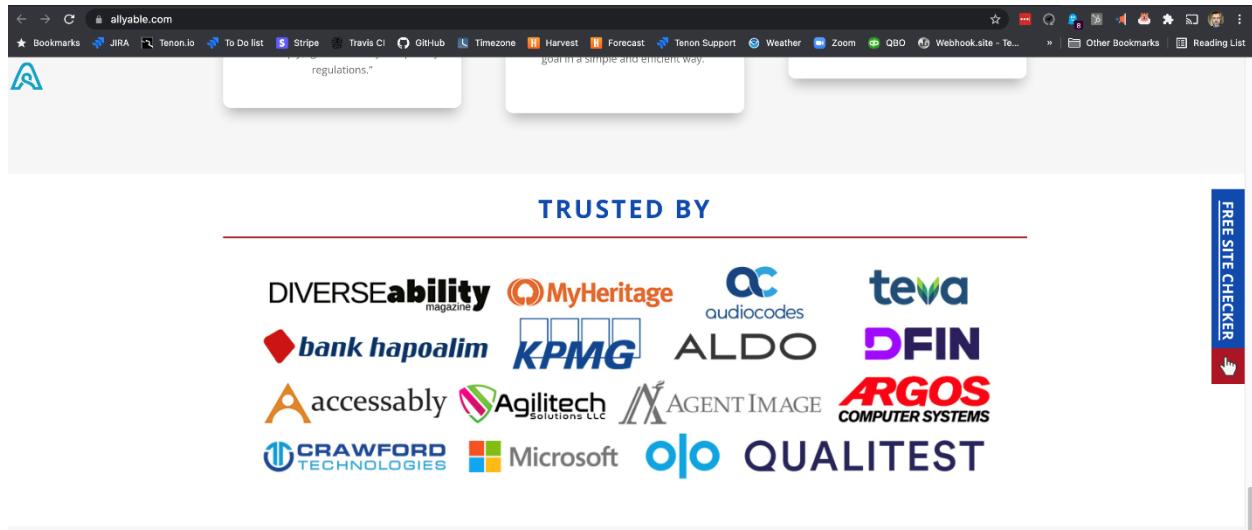


Figure 3: Trusted By (Captured on October 21, 2021)

Evidence from Twitter

<https://twitter.com/allyable>

On their Twitter profile, allyable claims it is, “[t]he fastest way to reach your digital accessibility goals.” (<https://twitter.com/allyable>), which is an easy boast when you also claim that you are the “only digital accessibility provider that gives an end-to-end solution”:

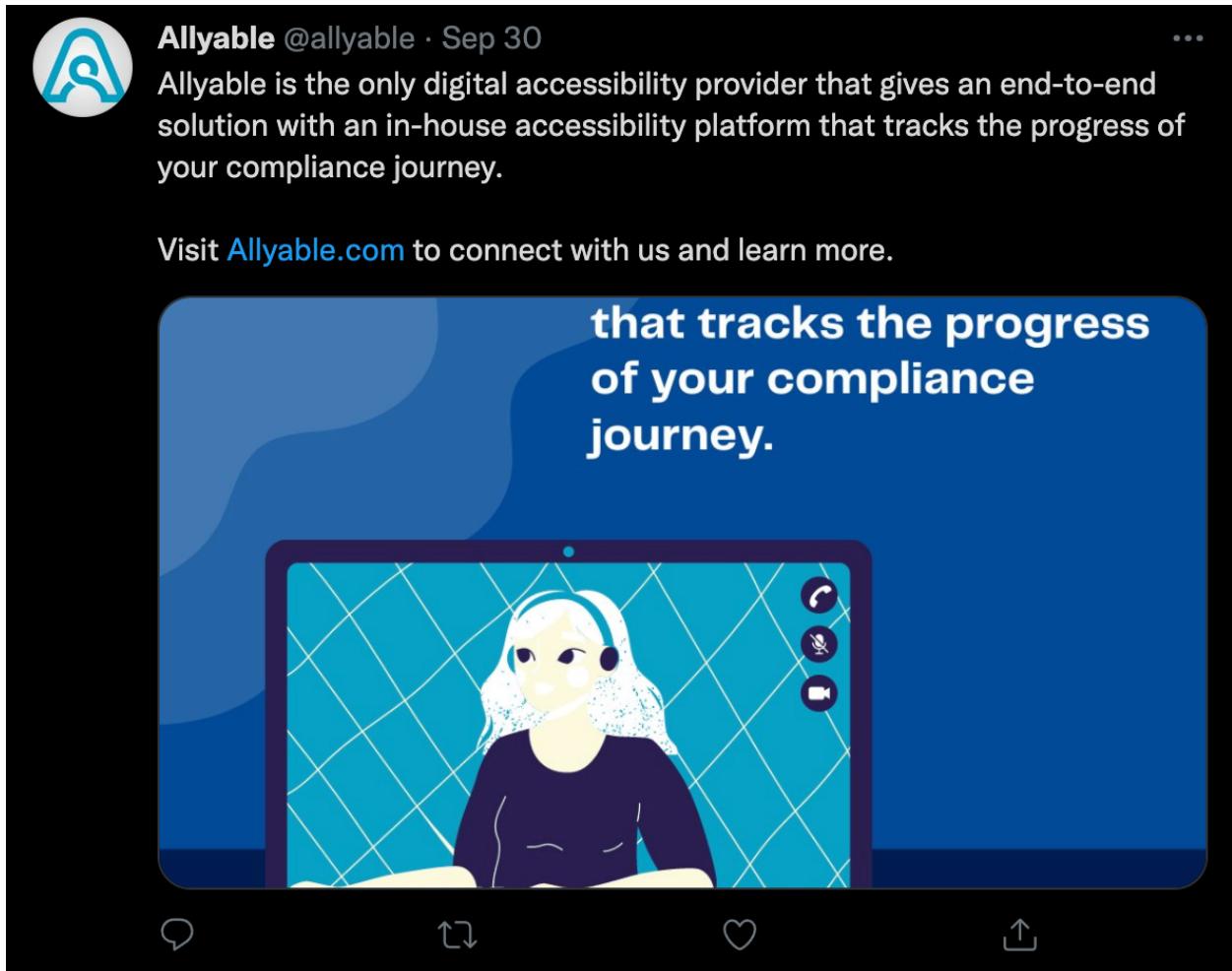


Figure 4 : Allyable is the only digital accessibility provider (Captured on October 21, 2021)

<https://twitter.com/allyable/status/1443592062528413704>

The company promises the “easiest and fastest solution to make your digital assets ADA compliant”:

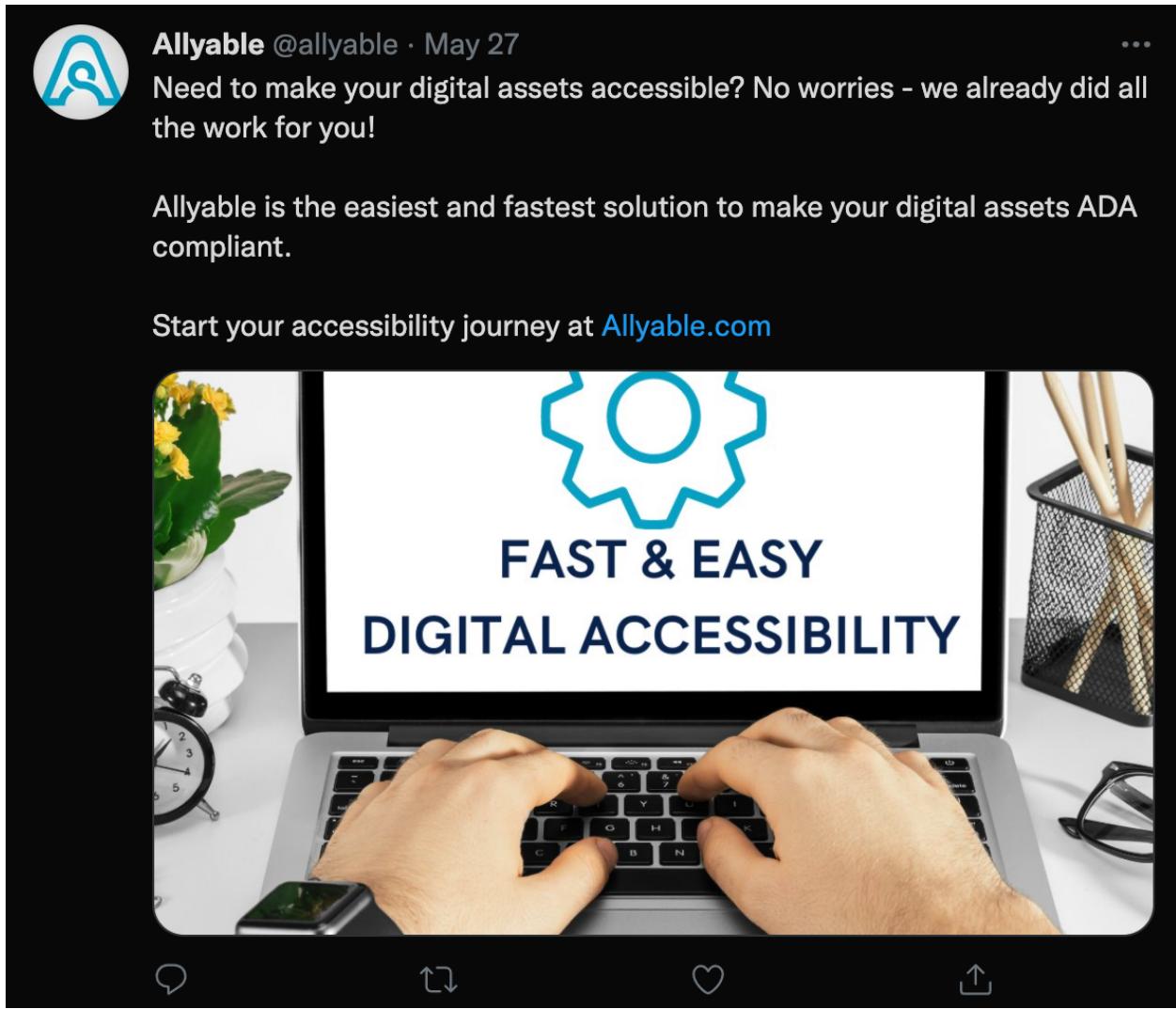


Figure 5: Fast & Easy (Captured on October 21, 2021)

<https://twitter.com/allyable/status/1397916050075701250?s=20>

In this tweet, Allyable touts that its solution is “truly accessible” and “beyond just a toolbar”:

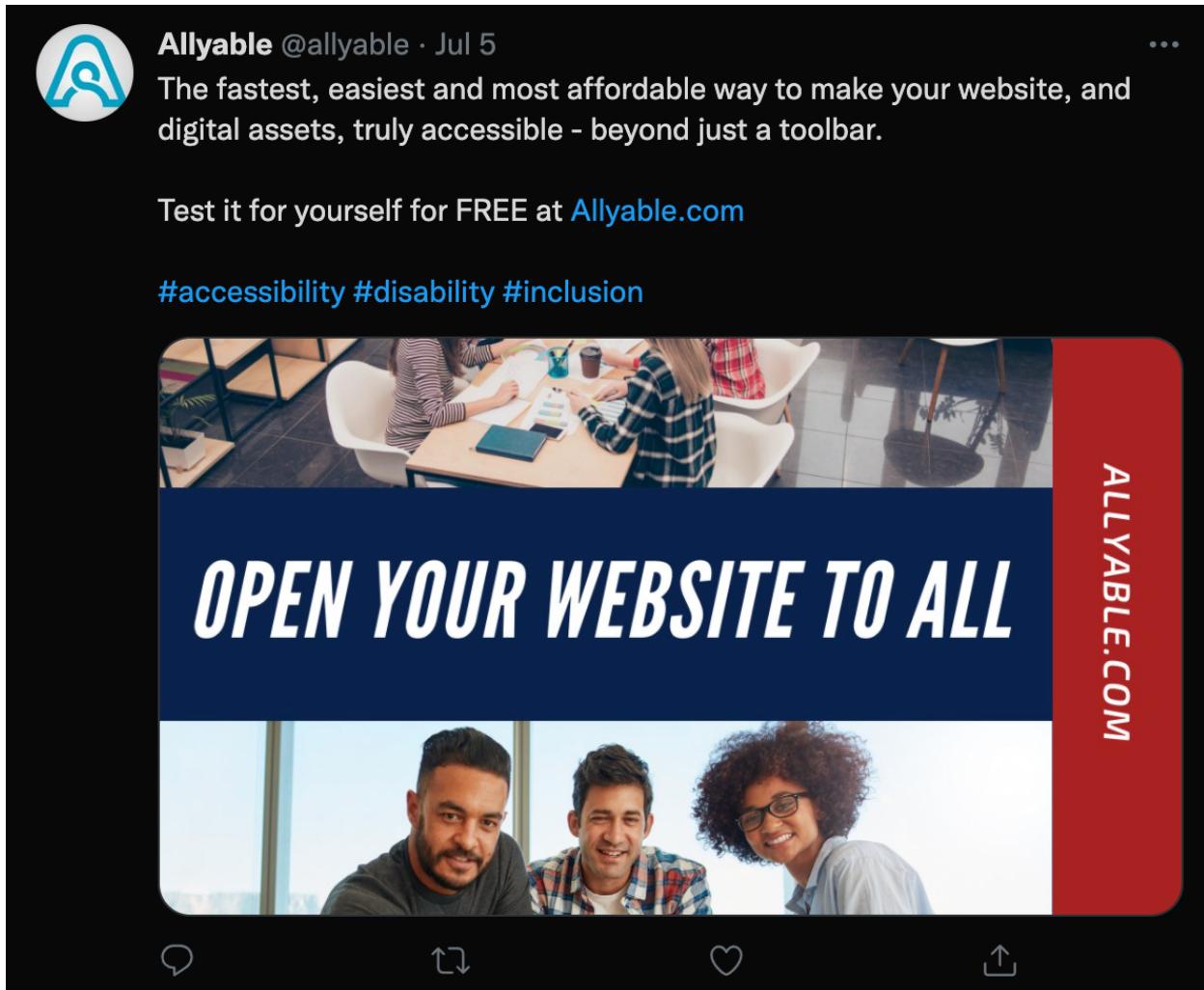


Figure 6: Open Your Website to All (Captured October 21, 2021)
<https://twitter.com/allyable/status/1412090355277877259?s=20>

Finally, the company promises that its AllyFix™ product uses “advanced AI...to consistently correct most identified eros [sic] automatically”:

 **Allyable** @allyable · Oct 7

AllyFix™ by Allyable takes care of all accessibility issues 24/7. Using advanced AI, image processing and web accessibility testing to consistently correct most identified eros automatically.

Visit Allyable.com to learn more about AllyFix.

Fix compliance issues 24/7 on existing websites, intranets and other digital assets with consistency and accuracy. AllyFix incorporates advanced AI, image processing and web accessibility testing to consistently correct most identified errors automatically. No-code wizards simplify remediation, letting you easily fix a wide range of internet and intranet digital assets.

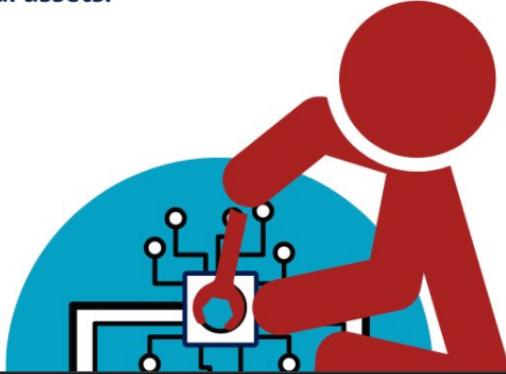


Figure 7: AllyFix (Captured October 21, 2021)
<https://twitter.com/allyable/status/1446129081863471104?s=20>

accessiBe

Address: 6 Hachilazon, RAMAT GAN, 5252270 Israel

Website: <http://accessibe.com>

"By using AI and automation, we can make thousands of websites accessible in the amount of time it used to make just one - and at a fraction of the cost. Our AI is taught to go beyond basic requirements and create an exceptional digital experience for people with disabilities." (<https://accessibe.com/company>)

Evidence from Website

The claims begin before the fold, so to speak, as one visits the accessiBe homepage, with claims of a "2-minute installation for 24/7 automatic accessibility":

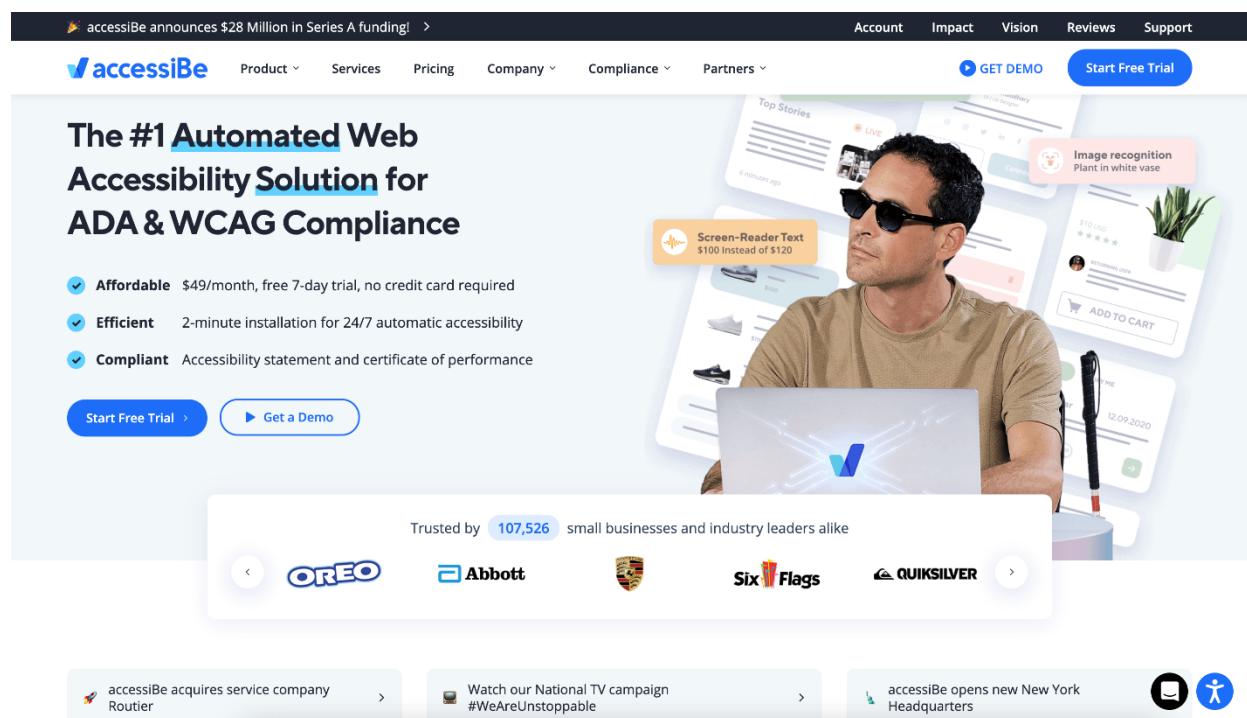


Figure 8: accessiBe Homepage (Captured on October 20, 2021)

The company's website makes strong claims that their product will almost magically make any website accessible with only "a single line of JavaScript code":

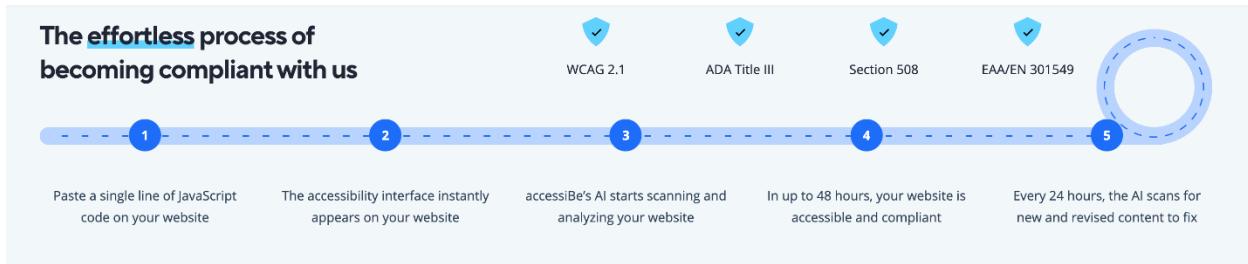


Figure 9: The effortless process (captured October 16, 2022)

A NEW ACCESSIBLE REALITY

Thanks to AI, the dream of an accessible web is finally attainable!

By leveraging machine-learning, we are revolutionizing the way websites are made accessible and have set out to make the entire Internet accessible by 2025.

accessiBe makes thousands of websites accessible in the time it used to take to make just one. The possibility of an accessible Internet is finally a practical reality.

[More on Our Vision >](#)

Figure 10: A New Accessible Reality (captured on October 16, 2021)

And (in our opinion), the most egregious claim is about using accessiBe can “stop any lawsuit in its tracks.” :



Home / Support / Legal & privacy / **Does accessiBe prevent lawsuits?**

Does accessiBe prevent lawsuits?

Let's start with the fact that anyone can make a claim against anyone at any time for any reason. Of course, the fact that someone claimed something doesn't make them right. With accessiBe, your website is indeed accessible and compliant and in the rare case of such a claim, we will provide you with everything you need to prove compliance. **Here's how:**

Once you have accessiBe installed, you will receive an accessibility statement. This statement outlines the adjustments accessiBe has made to your website, in terms of browser and assistive technology compatibility. It certifies that your website is compliant with the WCAG 2.1 AA guidelines - which makes you compliant with all international accessibility standards!

In addition, accessiBe sends monthly compliance audit reports for each domain, which is another great asset to have to further prove that your website is fully accessible and compliant. We recommend downloading these monthly reports for proof of ongoing efforts to maintain compliance standards.

At this point, you should have enough to stop any lawsuit in its tracks. However, if the case still hasn't been dropped then accessiBe offers a Litigation Support Package which includes documentation and testing from our R&D team, suggested responses, and our ongoing support.

Figure 11: Does accessiBe prevent lawsuits? (Captured on October 18, 2021)

Evidence from E-mail

The following is a marketing email from accessiBe received on March 23, 2021, wherein they claim to “remediate websites according to ADA and WCAG

guidelines...within 48 hours."

----- Forwarded message -----
From: Elle - accessiBe <elle@accessibe.on.crisp.email>
Date: Tue, Mar 23, 2021 at 9:08 PM
Subject: Hey, I'm here if you have any questions
To: <tbosken@gmail.com>

Hey, I'm here if you have any questions

Hi Tema!

We remediate websites according to ADA and WCAG guidelines.

Here's what do:

accessiBe scans and analyzes your website using AI technologies. Then, it applies all the required adjustments to become ADA and WCAG 2.1 compliant. This process takes up to 48 hours from installation.

The process of becoming compliant using our solution is very simple:

1. Install our single line of JS code.
2. Your website instantly displays our accessibility interface.
3. Our AI starts scanning and analyzing your website.
4. In 48 hours, our AI is finished, and your website is compliant.
5. Our AI re-scans for new and revised content to process every 24 hours.

The accessibility interface solves 30% of the ADA and WCAG 2.1 requirements immediately. This includes mostly UI and design features such as sizing, colors, and spacing.

The remaining 70% are solved within 48 hours, by our AI that runs in the background and adjusts your website, to make it operable using a screen reader (for blind people) and the Keyboard (for the motor impaired).

The AI process includes several solutions: ALT (alternate text) attribute creation for images using image recognition and OCR technologies, form label creation and handling link/button icons using a contextual understanding technology, as well as fixing popups, menus, dropdown, forms, and more.

Please note: accessiBe will not change a thing for the majority of users. It will only be activated when turned on via the interface (or a Screen-reader if the user is blind), as an overlay to your website, and only to the user's specific session.

Therefore, accessiBe won't affect your design, UI, or performance at all.

The entire process is automated. From remediation to becoming compliant, no manual work is being done.

--

 Elle from [accessiBe](#).

Figure 12: Marketing email from accessiBe (received on March 23, 2021)

Evidence from Twitter

<https://twitter.com/accessibe>

The company's tweets often boast about how they can "make websites #ADA compliant":

accessiBe @AccessiBe · Sep 24, 2020

#accessiBe makes websites #ADA compliant so that people with disabilities can have equal #access to the Internet
#PWD #blind #disabilityinclusion #webaccessibility

lawstreetmedia.com

RadioShack Sued for Alleged ADA Website Accessibility Violation - Te...

On Monday, Windy Lucius filed an Americans with Disabilities Act (ADA) complaint against General Wireless Operations Inc., which does...

Figure 13: accessiBe makes websites ADA compliant (Captured on October 24, 2021)
<https://twitter.com/AccessiBe/status/1309123843995377673>

Evidence from Facebook

<https://www.facebook.com/accessibe>

The company also actively uses Facebook as a marketing tool, often touting its ability to allow websites to "meet ADA compliance without spending an arm and a leg":



accessiBe

Based in Israel · March 4, 2019 · 🌎

...

In the past, it used to cost thousands of dollars for web developers to put together accessible websites that met international regulations – but no more. With AccessiBe's AI, you'll be able to meet ADA compliance without spending an arm and a leg to get there.

Want to learn more about how it works? Head to our website today!



1 like 3

↗ Share

Figure 14: In the past... (<https://www.facebook.com/accessibe/posts/1156399274547046>)

The company also likes to publicize its how AI is “a better way” than manually fixing errors:

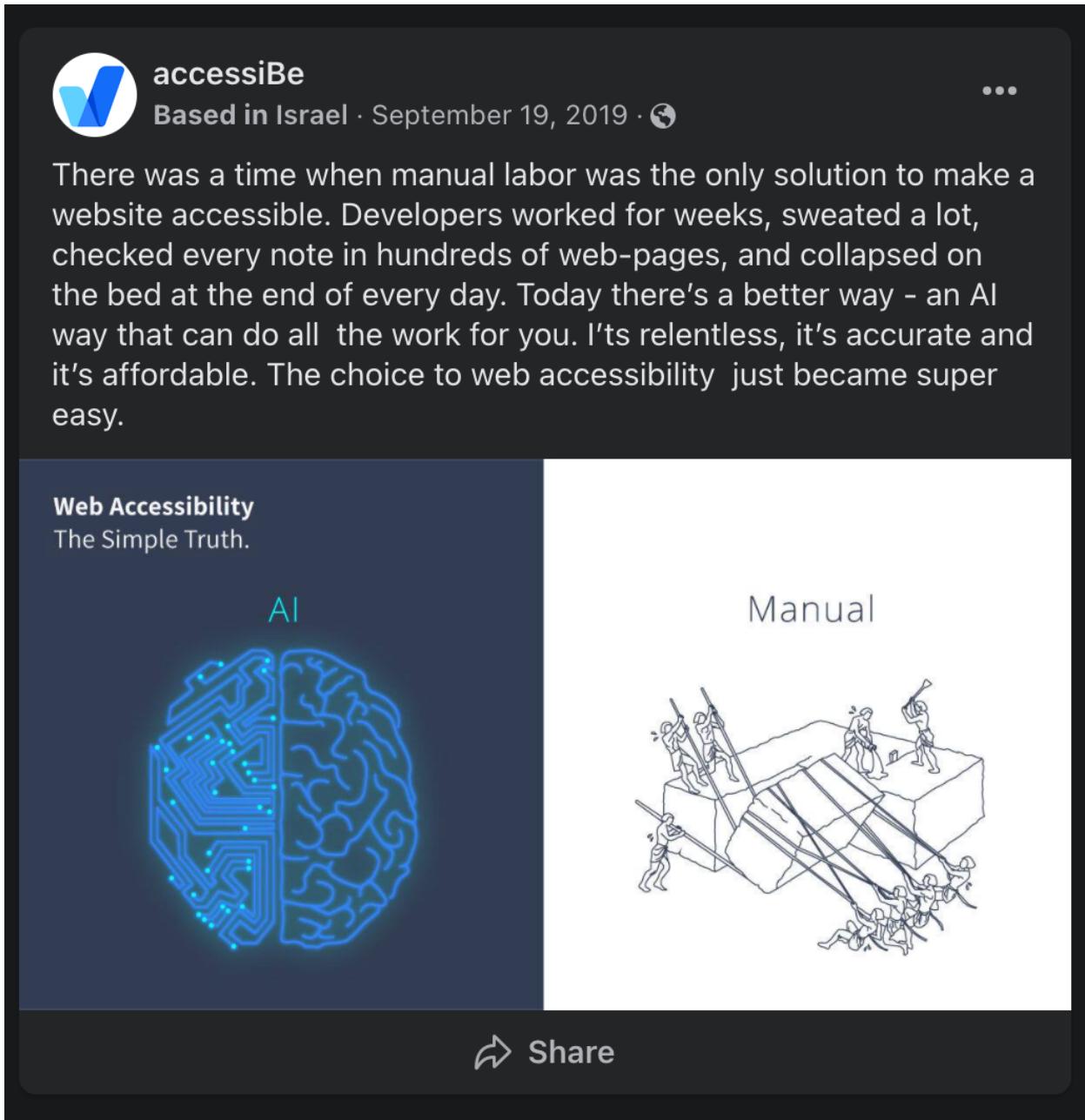


Figure 15: Manual Labor (<https://www.facebook.com/accessibe/photos/a.1070584513128523/1314238058763166>)

 accessiBe
Based in Israel · November 5, 2019 · 

There was a time when manual labor was the only solution to make a website accessible. Today, there's a better way - an "AI" way that can do all the work for you. It's fast, it's accurate, and it's affordable. The choice for web accessibility solution just became super easy.

Web Accessibility
The Simple Truth.

AI



Manual



 92 1 Share

 Share

Figure 16: Manual Labor 2
(<https://www.facebook.com/accessibe/photos/a.1070584513128523/1364497460403892/?type=3>)

Facebook is also a place where they post videos declaring how their solution “solves web accessibility issues on every website”:

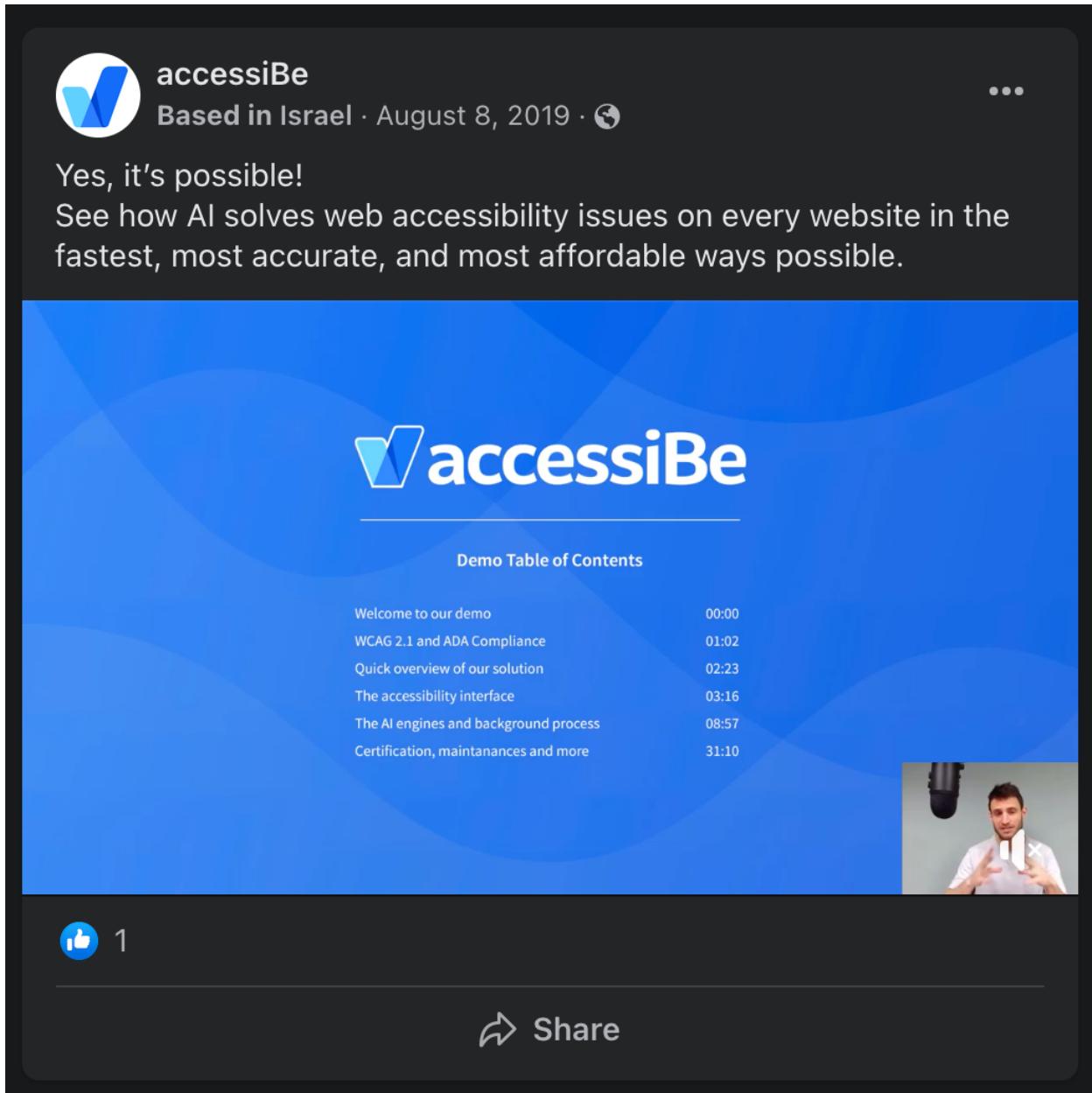


Figure 17: Yes, it's possible! video (<https://fb.watch/8U59pVdrlc/>)

Finally, we find this example to be the most gauche, as it preys on a fear of people with disabilities:

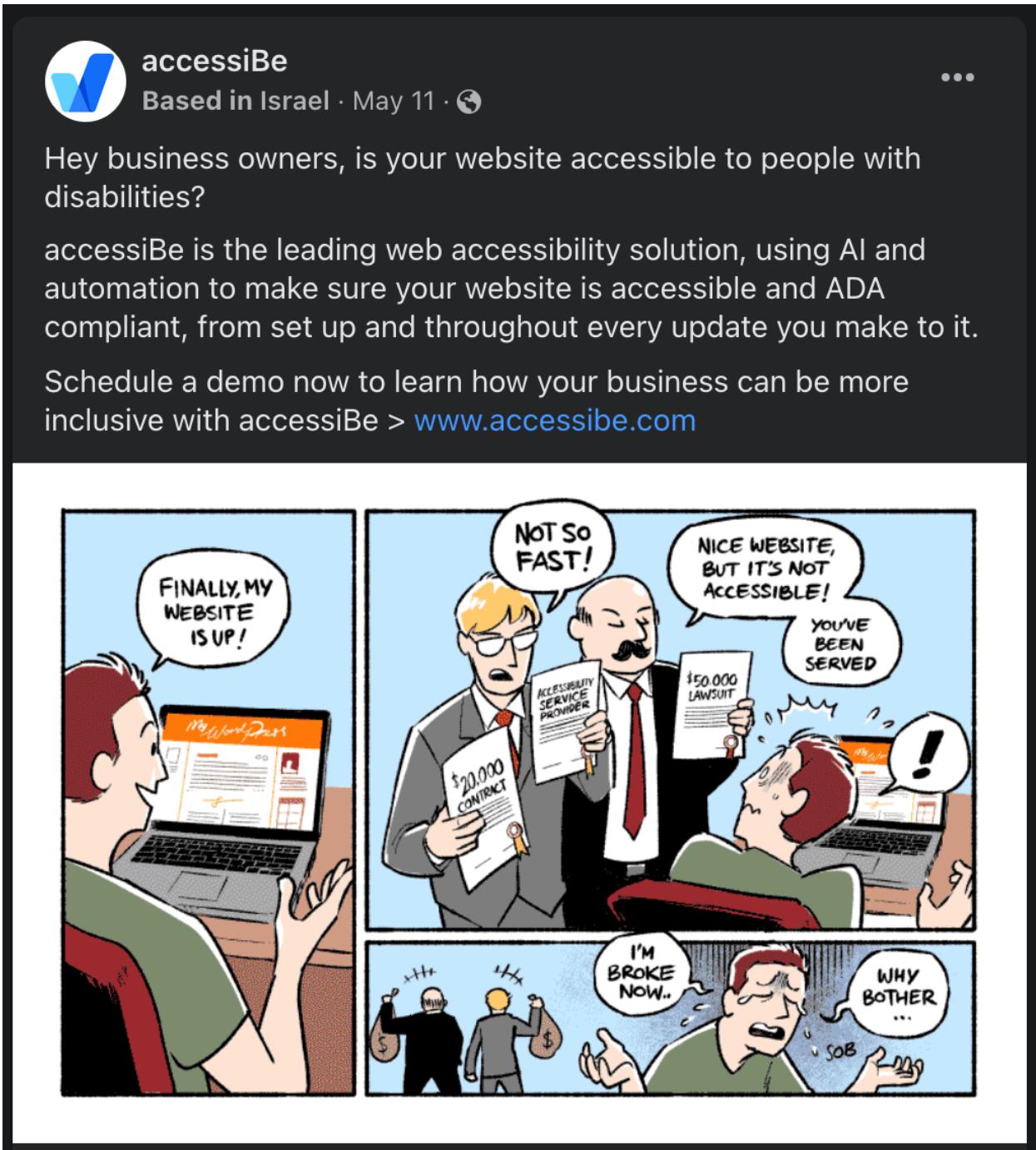


Figure 18: Hey Business Owners (<https://www.facebook.com/accessibe/posts/1948500805336885>)

Evidence from LinkedIn

<https://www.linkedin.com/company/accessibe/>

In a comment on LinkedIn, CEO Shir Ekerling claimed that no company has ever been sued because of accessiBe. That may have been correct at the time of the post, but as we've shown, that's not true anymore:



Figure 19: LinkedIn comment from Shir Ekerling

Evidence from Google Ads (source: SpyFu.com)

accessiBe spends an estimated \$16,531 on CPC ads per month.
40% of the accessiBe website traffic comes from CPC ads

The company's advertising on Google suggests one can avoid being sued by using their product:

[Is Your Website ADA Compliant? | Avoid Lawsuits with accessiBe"](#)

Ad www.accessibe.com/

Comply with international legislation & standards: ADA, WCAG 2.1, Section 508 & EN 301549. The only automated web accessibility solution, trusted by industry-leading organizations. Image Recognition. Giant Tech Collaborations.

[Pricing](#) ? [Examples & Demo](#) ? [Story & Vision](#) ? [Technology](#)

Figure 20: Is Your Website ADA Compliant Google Ad (captured January 1, 2020)

Evidence of other anti-competitive behavior

When using an automated accessibility tool such as WAVE, accessiBe's overlay blocks a proper scan of the site:

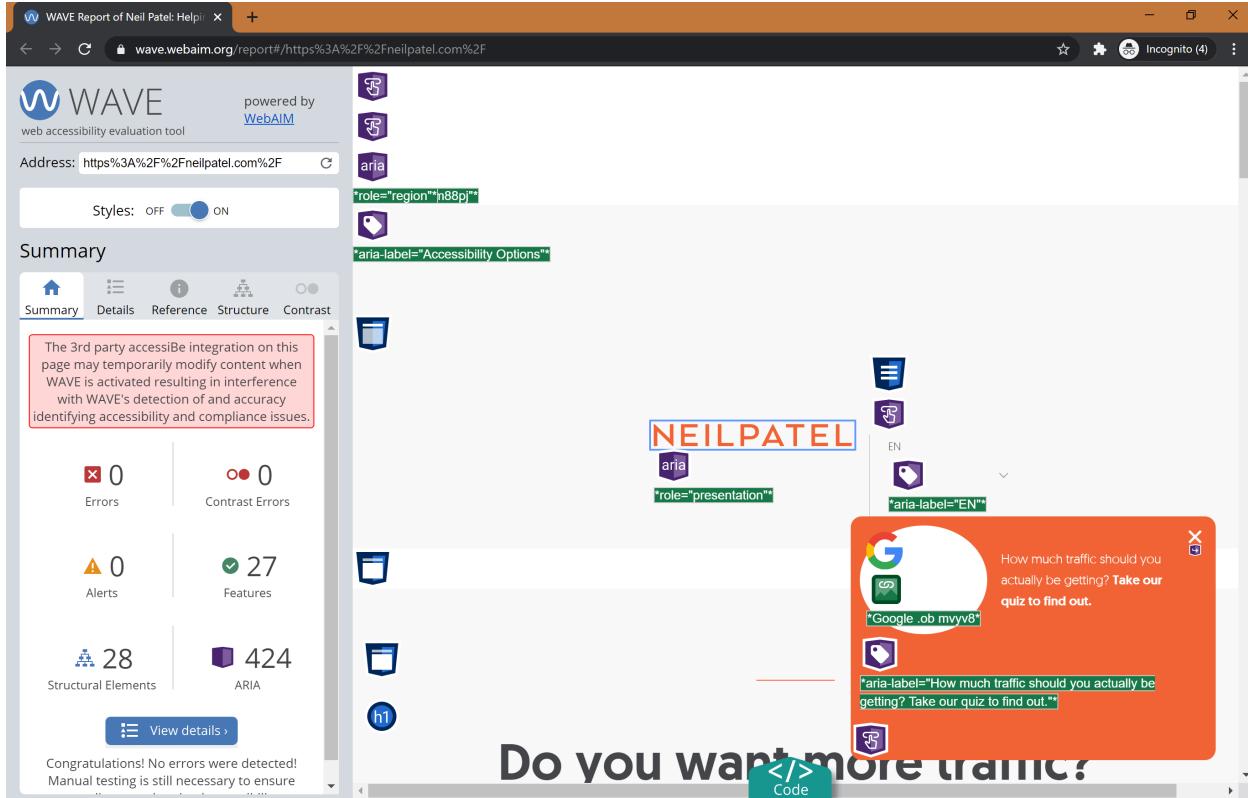


Figure 21: accessiBe Blocks Automated Scans

Evidence that accessiBe's solution does not live up to its promises
The captions that accessiBe automatically generates are poor even by auto-caption standards. The audio for the below was, "...collaborated with lead developers from the JAWS team...":

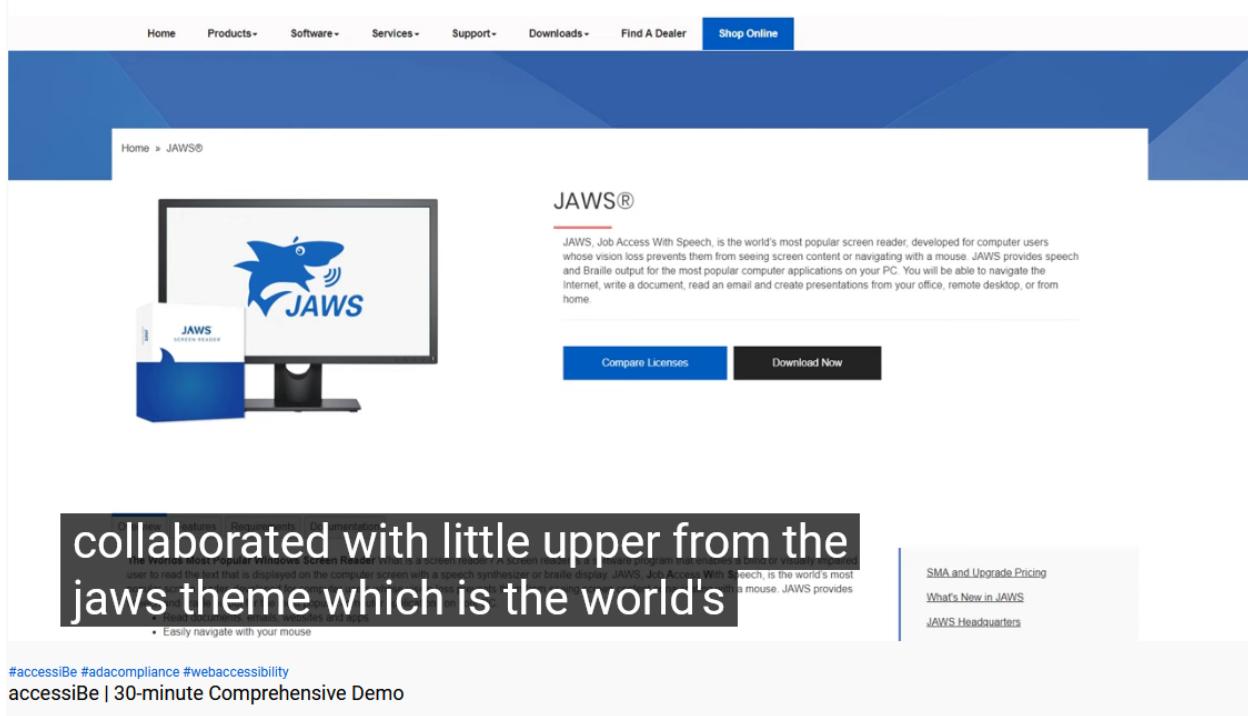


Figure 22: accessiBe's Auto Captions Fail

Accessus.ai

Address: 102 West Pennsylvania Avenue Suite 401, Towson, MD 21204, United States
Website: <https://accessus.ai/>

"The Accessus.ai mission is to contribute towards making the entire internet completely accessible so that everyone, with or without disabilities, can enjoy the universe of content it has to offer.

In today's legal environment, ALL businesses are now challenged with meeting the current technical and compliance standards in addition to the potential threat of expensive litigation defense and settlement costs.

The Accessus.ai solution is designed with your complete technical and legal situation taken into consideration on a long-term basis."

(<https://accessus.ai/about>)

Evidence from Website

The company promises "Fully Automated WCAG 2.1 AA Compliance" in "less than 48 hours":

Accessus.ai Is Web Access Automated

SaaS ~ Enterprise Level Web Accessibility And Fully Automated WCAG 2.1 AA Compliance

- ✓ No Risk: Complimentary 7 Day Trial
- ✓ Easy Installation: Add a single line of code to your website for 24 /7 Automated Compliance
- ✓ Rapid Compliance: Receive your Accessibility Statement and Certificate of Performance in less than 48 hours.

[Start Free Trial](#)

[Schedule A Demo](#)



Figure 23: Accessus.ai is Web Access Automated (Captured October 27, 2021)

When one schedules a demo, they are told once again that compliance can be achieved in “less than 48 hours” using the company’s “Artificial Intelligence”:

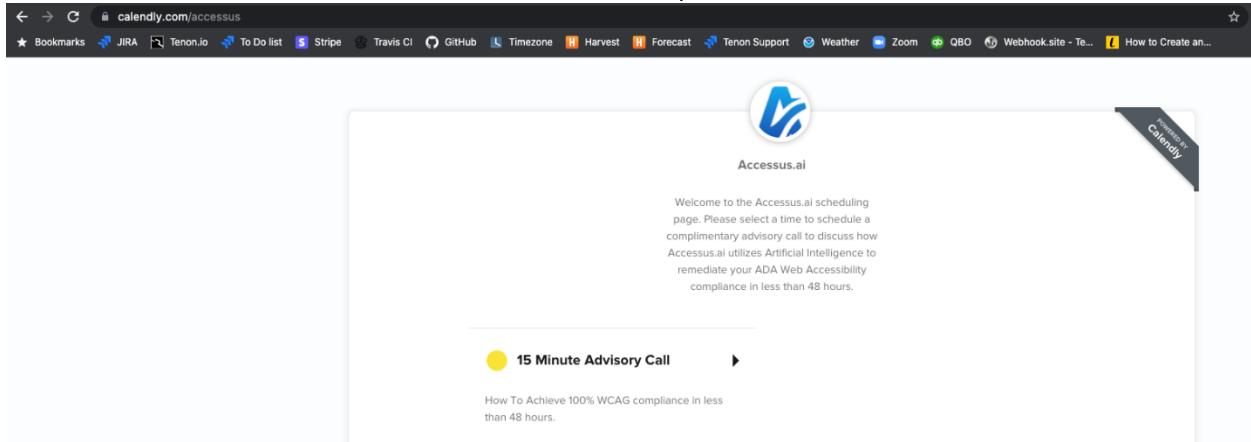


Figure 24: Schedule a 15 Minute Advisory Call

In addition to the familiar claims of “a single line of JavaScript code” to achieve “fully compliant and certified” status, Accessus.ai takes the low road by throwing some of its named clients (e.g., AudioEye, User1st, UserWay, WP Access) under the proverbial bus, claiming they cannot deliver the same scope of compliance (e.g., WCAG 2.1, ADA, s508) in a similar 48-hour time frame. They also claim that their solution has the

"[i]ndustry highest success rate" while others only meet 5% to 50% of the requirements within 6 months without providing a source for this data:

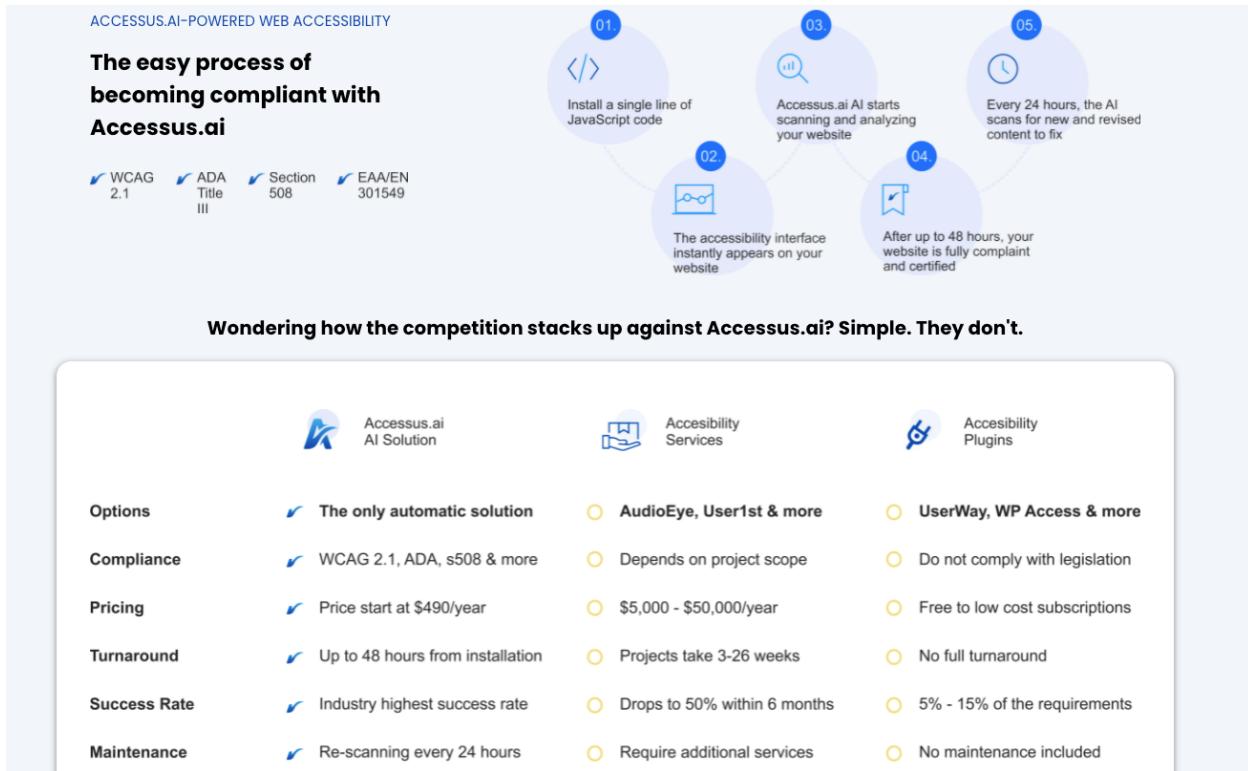


Figure 25: Accessus.ai-powered web accessibility

Much like other overlay companies, Accessus claims that its product can "[p]rotect and defend" against "costly litigation[sic]":

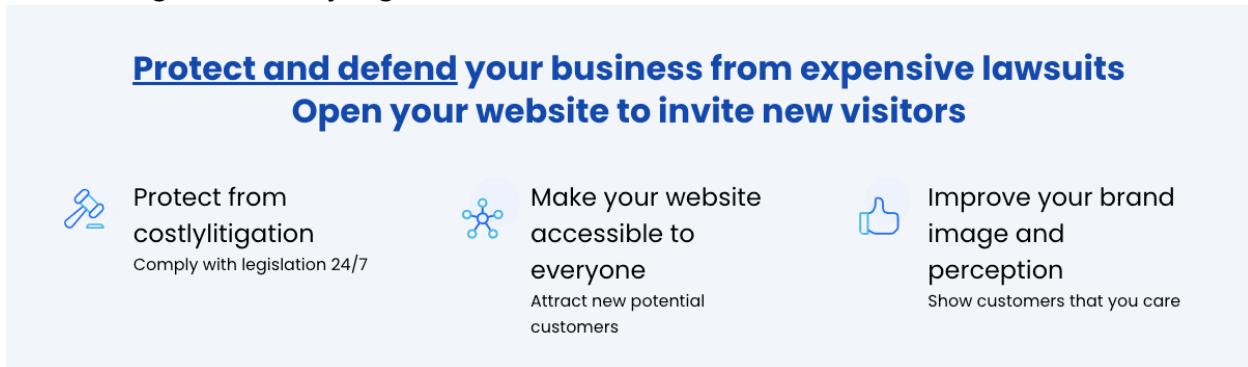


Figure 26: Protect and Defend

The company's answer to how they provide protection from litigation makes the same bold and spurious claims as many of its competitors, including offering a worthless "Certificate of Performance":



Figure 27: How Accessus provides protection from litigation

The company claims that their solution "provide[s] and maintain[s] 100% WCAG compliance standards."

A SINGLE LINE OF CODE TO ACHIEVE AUTOMATED COMPLIANCE

How does it work? Automatically, with Artificial Intelligence.

Accessus.ai is improving and automating web accessibility by replacing an expensive, time-consuming manual process with automated, state-of-the-art AI technology

Automatic Screen-Reader adjustments Powered by AI

Utilizing contextual understanding and image recognition, Accessus.ai scans and analyzes websites to understand and learn what elements and functionality they include, and adjusts them to vision impaired users' screen-readers

- Alt Tag
- Icons & Buttons
- Breadcrumbs
- Expanded Dropdown
- Product Categories
- Search Field
- Cart Button
- Picture of Big Black Headphones
- Prev Button
- Next Button
- Carousel Slides
- State Controls
- Roles & Landmarks
- ARIA Attributes
- Forms & Validations

The Accessus.ai solution is designed to provide and maintain 100% WCAG compliance standards while widgets and plugin's only provide a limited level of protection against frivolous lawsuits.

[Learn About AI Engine](#)

Figure 28: How does it work? (Captured October 27, 2021)

Relatively unique among their peers, Accessus.ai also claims that their solution can offer CCPA and GDPR Compliance:

CCPA & GDPR COMPLIANT
Your website's security and users' data privacy are a top priority

Accessus.ai implements the highest industry standards and best practices in regards to both CCPA and GDPR. The security of the websites we operate on and the privacy of their users is a top priority.



Figure 29: CCPA & GDPR Compliance

The company claims that their product will protect their customers from accessibility-related litigation and that the product covers **all** (emphasis mine) WCAG 2.1 AA (and some AAA) guidelines:

Does Accessus.ai protect my business from lawsuits?

Absolutely! Accessus.ai makes your inaccessible websites compliant with WCAG and ADA in less than 48 hours. In addition, Accessus.ai provides a Litigation Response Package in the event you need to prove your ADA website is compliant and guides you through the response process.

Does Accessus.ai cover all required accessibility guidelines?

Yes! The Accessus.ai platform covers the WCAG (Web Content Accessibility Guidelines) version 2.1 at the AA level and in certain areas level AAA is achieved which is a step beyond current legislation requirements.

Figure 30: Accessus.ai FAQ (Captured October 20, 2021)

ActiveIntent

Website: <https://theactiveintent.com/>

Active Intent makes your website voice activated on mobile and desktop. Users can click on the generated microphone icon and start conversationally interacting with your website. (<https://theactiveintent.com/>)

Evidence from Website

The company claims that voice activated websites, "ensure American with Disabilities Act compliance."

Why Voice Activated Websites?

01 Increase conversions by 30%

- For eCommerce companies, integrating voice into the customer journey decreases friction and number of steps to purchase.
- For content companies, readers have access to content on audio straight from your website by clicking a speaker icon.

02 Expand your customer base

- Mobile users prefer using voice to navigate websites. Capture more of them to convert on your website instead of sending them to your app.
- 17 million Americans are blind or paralyzed in the USA.

03 American with Disabilities Act Compliance

- Ensure American with Disabilities Act compliance to reduce legal exposure and ensure every type of person can experience your brand.

Figure 31: Why Voice Activated Websites (captured on October 27, 2021)

AudioEye

Address: 5210 E Williams Circle, Suite 750, Tucson, Arizona 85711, US

Website: <https://www.audioeye.com/>

"AudioEye's industry-defining digital accessibility platform delivers website compliance efficiently and affordably for organizations of all sizes. Our platform leverages a decade of investment in advanced technology supported and informed by our team of dedicated IAAP-certified professionals to help deliver improved access to the web."
(<https://www.audioeye.com/about-us>)

Evidence from Website

AudioEye claims several high-profile customers, at least one of whom, WebMD does not reciprocate the claim on their respective websites:

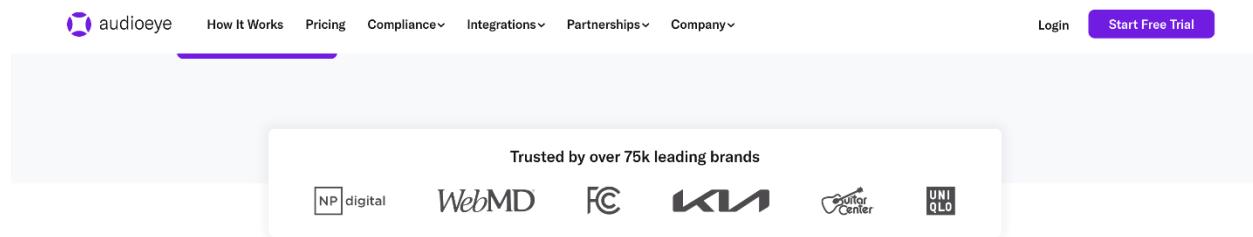


Figure 32: Trusted by over 75k leading brands

Evidence from Twitter

<https://twitter.com/audioeyeinc>

The company claims its product will, "get you compliant on day one."



Figure 33: Find the best plan (Captured October 21, 2021)

<https://twitter.com/audioeyeinc/status/1357340661041623044?s=20>



Figure 34: Protected from Day One (Captured October 21, 2021)

<https://twitter.com/audioeyeinc/status/1351955182326841346>

Evidence from Google Ads (source: SpyFu.com)

AudioEye spends an estimated \$24,786 on CPC ads per month. 62% of the AudioEye website traffic comes from CPC ads.

The company Google Ads make promises of compliance with accessibility laws and standards "on Day 1."

[ADA Site Regulation Compliance | Is Your Website ADA Compliant?](#)

<http://audioeye.com/>

Quick, Cost-Effective Solutions Compliant with ADA & WCAG Laws on Day 1 of Implementation. Make Your Website Accessible Fast - Get Started Now with a Free Accessibility Analysis. Avoid Legal Action. F

Ad Position: 2 Date: December 2019

Figure 35: ADA Site Regulation Compliance (Captured by Spyfu in December 2019)

[ADA & WCAG Digital Compliance | WCAG 2.1 Compliance Solutions](#)

<http://audioeye.com/>

Make Your Website Accessible Fast. Get Started Now with a Free Analysis from an Expert. Quick, Cost-Effective Solutions Compliant with ADA & WCAG Laws on Day 1 of Implementation. Free Accessibility Au

Ad Position: 2 Date: May 2020

Figure 36: ADA & WCAG Digital Compliance

[#1 Accessibility Solution - ADA & WCAG Compliance](#)

<http://audioeye.com/>

Remove accessibility barriers for more than 60 million US adults living with a disability. No need to redesign your website or change your source code. Get started in 2 minutes. Day 1 Protection. Cont

Ad Position: 1 Date: November 2020

Figure 37: ADA & WCAG Compliance

Some of the company's ads use the scare tactic of an impending lawsuit and suggest one not "wait to be served":

Become Compliant With WCAG - Is Your Website ADA Compliant?

<http://audioeye.com/>

Quick, Cost-Effective Solutions Compliant with ADA & WCAG Laws on Day 1 of Implementation. Don't Wait to be Served - Make Your Website Accessible Today. Contact an Expert Now. Manual & Automatic Fixes

Ad Position: 6 Date: July 2020

Figure 38: Become Compliant with WCAG

AudioEye also offers "Certified ADA Compliance" even though such a certification does not exist:

WCAG Website Compliance - Website Accessibility Solved

<http://audioeye.com/>

Are You at Risk of a Lawsuit? Understand What ADA & WCAG Laws Mean For Your Business. Contact an Accessibility Expert for a Free Analysis & Get Certified ADA Compliance. Types: Accessibility Testing,

Ad Position: 1 Date: July 2021

Figure 39: Website Accessibility Solved

Finally, like many of its competitors, the company claims to be the only solution out there:

<https://www.audioeye.com> :

AudioEye: Web Accessibility - ADA - WCAG 2.1 - Section 508

AudioEye is the only solution that meets ADA and WCAG 2.1 compliance guidelines through a combination of advanced automation technology and human touch, ...

Figure 40: AudioEye is the only solution

EqualWeb

Address: 447 Broadway, 2nd FL #239 New York, NY 10013

Website: <https://www.equalweb.com/>

"EqualWeb is a development company that specializes in accessibility and advanced internet applications.

With more than two decades of experience, working closely with the blind and disabled, we have gained the confidence and support of many global customers. Our inspired and highly-experienced team of IT, accessibility experts, designers, programmers, and marketing experts are committed to one common goal - effectively offering an accessibility solution for your websites via an extremely simple and cost-effective process." (<http://www.equalweb.com>)

Evidence from Website

The company claims its widget "provides full ADA and WCAG 2.1 compliance" with, "no code changes required."

To what extent does EqualWeb comply with the ADA?



EqualWeb's Accessibility Widget provides full ADA and WCAG 2.1 compliance, powered by AI, and costs only \$39/month. Our AI-powered web accessibility widget dramatically reduces the cost of complying with ADA and WCAG regulations by integrating into your existing site architecture, meaning no code changes are required.

Figure 41: To what extent does EqualWeb comply with the ADA? (Captured October 24, 2021)

EqualWeb claims its solution is “over 100 million web pages” and that they provide their clients with “1,00,000\$ [sic] in digital accessibility warranty”:

Why should you choose EqualWeb over other accessibility solutions? -

As the software provider for over 100 million web pages, including those of international government agencies, banks, and small businesses alike, EqualWeb is the easiest, most robust way to make your site more accessible for all users. Our AI-powered rule engine is constantly learning from a vast array of WCAG violations and becoming more robust. Beware of non-compliant accessibility tools. It's careless to use tools that are not compliant with accessibility guidelines. Doing so can put your website performance and legal risk at risk. In fact, we are so confident with our solution that we are the only company in the market backing you up with 1,00,000\$ in digital accessibility warranty.

Figure 42: Why should you choose EqualWeb...? (Captured October 24, 2021)



Figure 43: \$1,000,000 warranty (Captured October 24, 2021)

Instead of providing names of its marquee clients, the company claims that their solution is installed on over 100 million web pages in a bogus attempt to conflate pages with clients and confuse prospective customers about its market penetration:

EQUALWEB
DIGITAL ACCESSIBILITY

Why EqualWeb Solutions Resources Plans & Pricing Partners Contact Us

Sign in Get Started

The World's #1 Web Accessibility Solution
Currently installed on 100,543,679 web pages!
Make your Website ADA Compliance – Tailored for Every Business Size!

Request a Demo Get Started Free

Figure 44: Currently installed on 100,543,679 web pages (Captured on October 24, 2021)

EqualWeb maintains that, aside from it's supposed unique \$1,000,000 warranty, it also uniquely provides compliance with accessibility standards while “all others” only promise a portion of that compliance goal and that “all others” do not offer on-going maintenance:

What Makes us Different from Others?

	EqualWeb	All others
 Compliance	Compliance with WCAG 2.1, ADA, Section 508, AODA, EN 301549 and IS 5568	"As closely as possible" "We aim to adhere" "Most site pages meet the accessibility criteria" "Increased compliance"
 Pricing	Ranging from free to tailored offer. Price match -20% policy, ensuring you will always get the BEST price.	No warranty From 490\$ to 100,000\$ per year
 Maintenance	Year-round protection	No Maintenance!
 Warranty	\$1,000,000 warranty	No Warranty!

Figure 45: What Makes EqualWeb Different (Captured on October 24, 2021)

Evidence from Twitter

Out of the proverbial gate, EqualWeb touts its solution as “instantly applicable” that meets “International Accessibility Standards”:



Figure 46: Instantly Applicable

<https://twitter.com/EqualWebDotCom/status/1196812164964724737>

EqualWeb claims that its widget will “automatically adjust” a website to fix keyboard navigation issues:

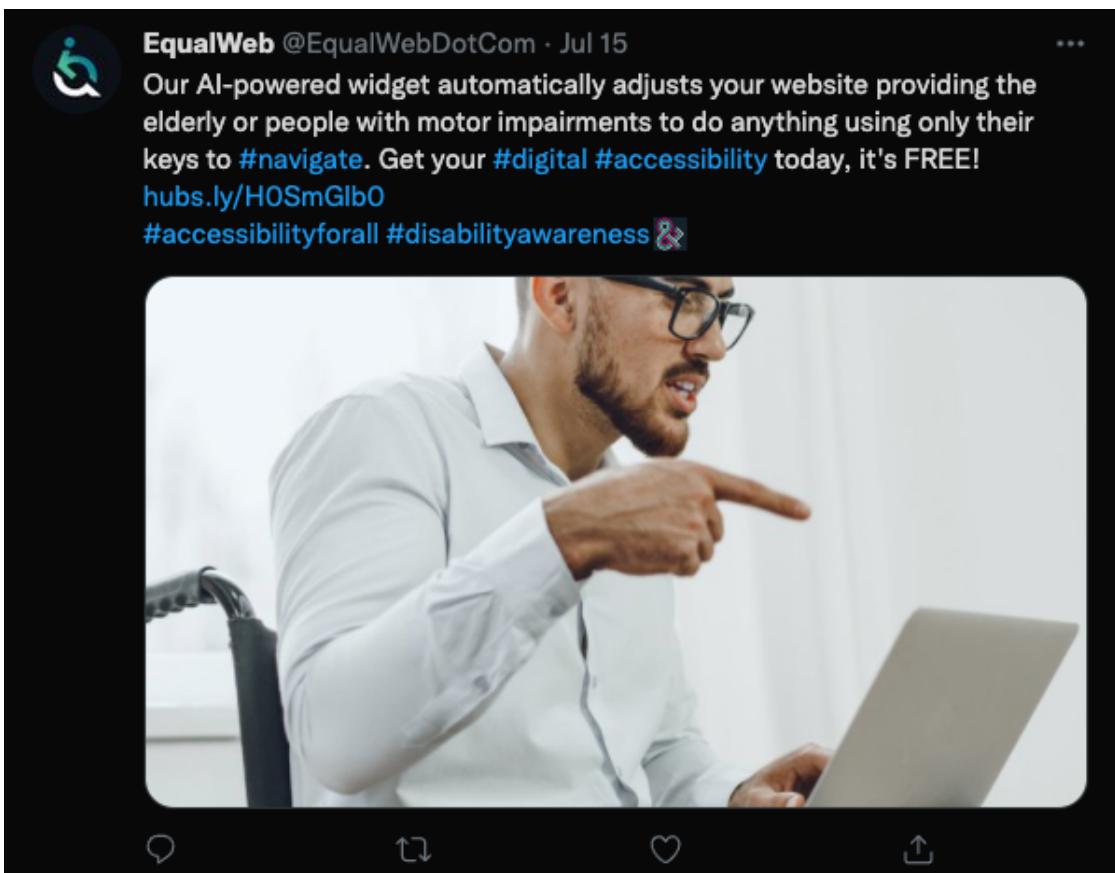


Figure 47: Only Their Keys to #navigate

In this tweet, the company makes the claim that 20 years of experience specializing in web accessibility has allowed them to offer a “simple and cost-effective solution,” suggesting that they’ve been offering an overlay widget for that length of time:



EqualWeb @EqualWebDotCom · Oct 31, 2019

EqualWeb is a company with over two decades of experience specializing in web accessibility. We are committed to one common: effectively offering an accessibility solution for your website using our simple and cost-effective solution.

Figure 48: Two Decades of Experience
<https://twitter.com/EqualWebDotCom/status/1189888468534616064>

By way of promising increased traffic to one’s website, EqualWeb claims to offer “100% ADA WCAG 2.1 AA” compliance. Curiously, they do not give a link in this tweet but instruct the user to go all the way back to the bio on their Twitter account to access a link:

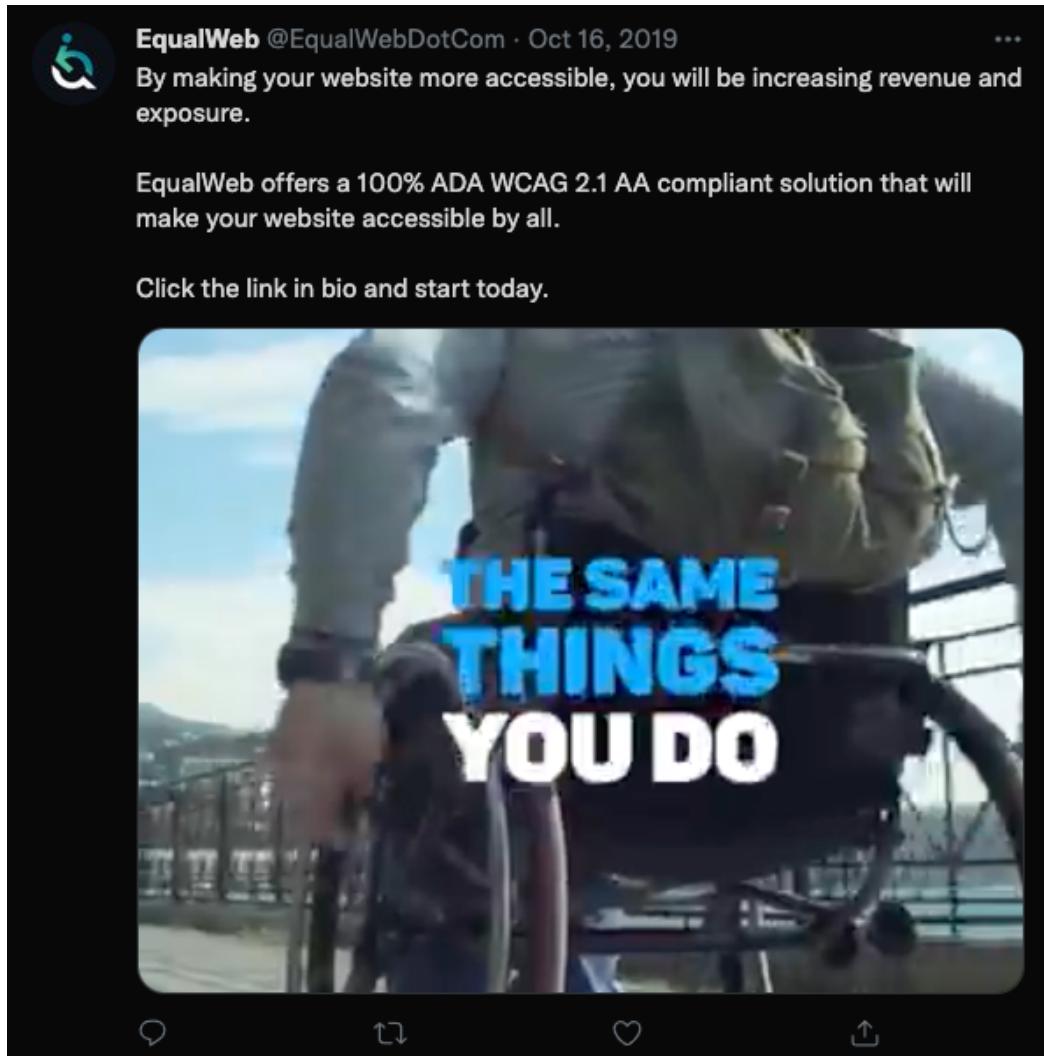


Figure 49: Increase Revenue and Exposure

<https://twitter.com/EqualWebDotCom/status/1184555355885522951>

The company claims that its “AI-powered accessibility solution” will assist in gaining brand recognition:

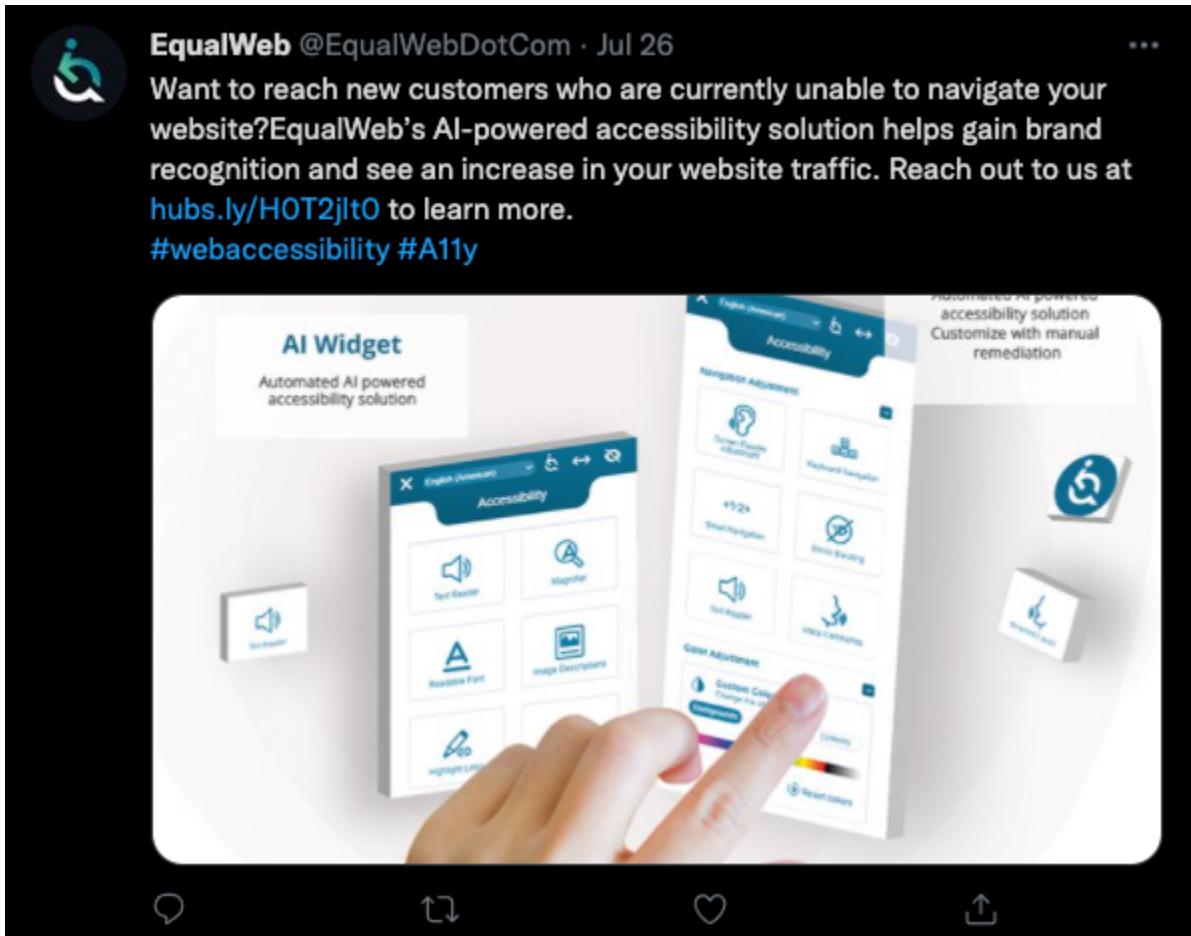


Figure 50: Brand Recognition
<https://twitter.com/EqualWebDotCom/status/1419618973860171781>

In this tweet, the company talks up its “premium #accessibility solution” that offers a “fully compliant” website as way to bring up its alleged \$1 million warranty:



Figure 51: Hybrid Approach

<https://twitter.com/EqualWebDotCom/status/1431943453169045504>

Evidence from Facebook

<https://www.facebook.com/EqualWebDotCom>

In the About section of their Facebook page, EqualWeb claims it provides “digital accessibility solutions making websites 100% compliant”:

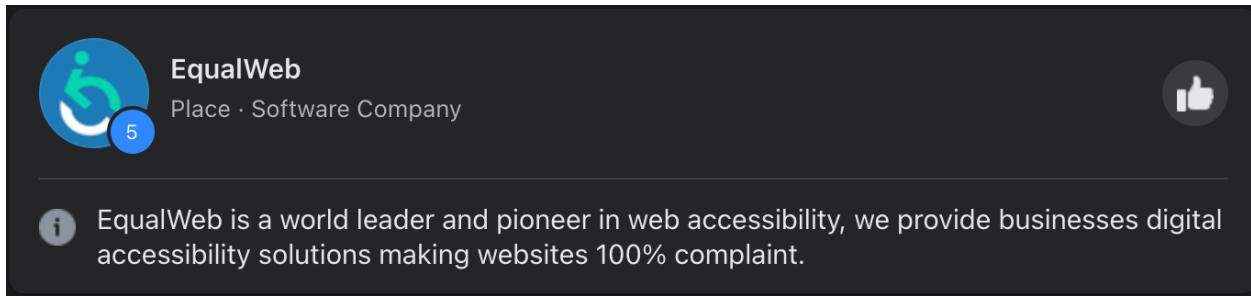


Figure 52: EqualWeb Facebook (Captured on October 27, 2021)

Evidence from Google Ads (source: SpyFu.com)

EqualWeb spends an estimated \$4239 on CPC ads per month.
22% of the EqualWeb website traffic comes from CPC ads

As with many of their peers, EqualWeb uses scare tactics in their marketing by saying that their solution will help their customers “avoid lawsuits”:

Equalweb.com - Avoid Lawsuits With EqualWeb™

<http://equalweb.com/>

The Only 100% Web Accessibility Solution Comply with International Legislation! No. 1 accessibility solution in the world with more than 10,000 installations. insert one-line-of-code. and we will do t

Ad Position: 4 Date: June 2021

Figure 53: Avoid Lawsuits with EqualWeb™

Is Your Website ADA Compliant?

<http://equalweb.com/>

The Only 100% Web Accessibility Solution Comply with International Legislation! No. 1 accessibility solution in the...

Ad Position: 4 Date: August 2021

Figure 53: Is Your Website ADA Compliant?

Avoid Lawsuits With Equalweb™ - ADA Compliance With Warranty

<http://equalweb.com/>

The Only 100% Web Accessibility Solution Comply with International Legislation! WCAG 2.1, ADA title 3, Section 508 and EN 301549 compliance with warranty, Equalweb™. and we will do the rest! insert on

Ad Position: 3 Date: September 2021

Figure 54: ADA Compliance With Warranty

The company also uses Google Ads to claim it is the “Only 100% Web Accessibility Solution” with “more than 10,000 installations”:

Free ADA Consulting - Get An ADA Compliance Website

<http://equalweb.com/>

The Only 100% Web Accessibility Solution Comply with International Legislation! No. 1 accessibility solution in the world with more than 10,000 Installations. insert one-line-of-code. and we will do t

Ad Position: 3 Date: September 2021

Figure 55: Free ADA Consulting

Free ADA Consulting - Full Compliance With Warranty

<http://equalweb.com/>

The Only 100% Web Accessibility Solution Comply with International Legislation! No. 1 accessibility solution in the world with more than 10,000 Installations. insert one-line-of-code. and we will do t

Ad Position: 3 Date: September 2021

Figure 56: Full Compliance With Warranty

Max Access (by Online ADA)

Address: 207 E 5th Ave. Ste 240, Eugene, OR 97401

Website: <https://maxaccess.io/>

"Since 2014 Online ADA has been the leading innovator in digital accessibility, providing the highest quality tools for developers to make the internet accessible to everyone.

After years of constant innovation and development we bring you the most elegant and robust solution for digital accessibility.

– Max Access – "

(<https://maxaccess.io/story-vision/>)

Evidence from Website

On their website, Max Access claims it can get a website "accessible in minutes and...will stay accessible even as you add new content":

[Request a Live Demo](#)

Max Access Scans and Automatically Fixes Your Accessibility Compliance Issues

Max Access works with any website platform or CMS. Once you set up Max Access on your website (with just one line of code), it immediately scans your site, analyzes it for compliance issues, and automatically fixes many of the issues it finds. Max Access will scan and remediate new content on your site every 24 hours.

This means you can get your website accessible in minutes and it will stay accessible even as you add new content.

Max Access features 3 core components. The AI, the Toolbar, and the Dashboard & Reports. These 3 core components work together to provide the most complete AI-driven accessibility solution available.

Figure 57: Max Access Scans and Automatically Fixes Your Accessibility Compliance Issues (Captured October 25, 2021)

The company's website offers "automatic code fixes" and a "WCAG/AODA/ADA/Section 508 Compliant" solution:

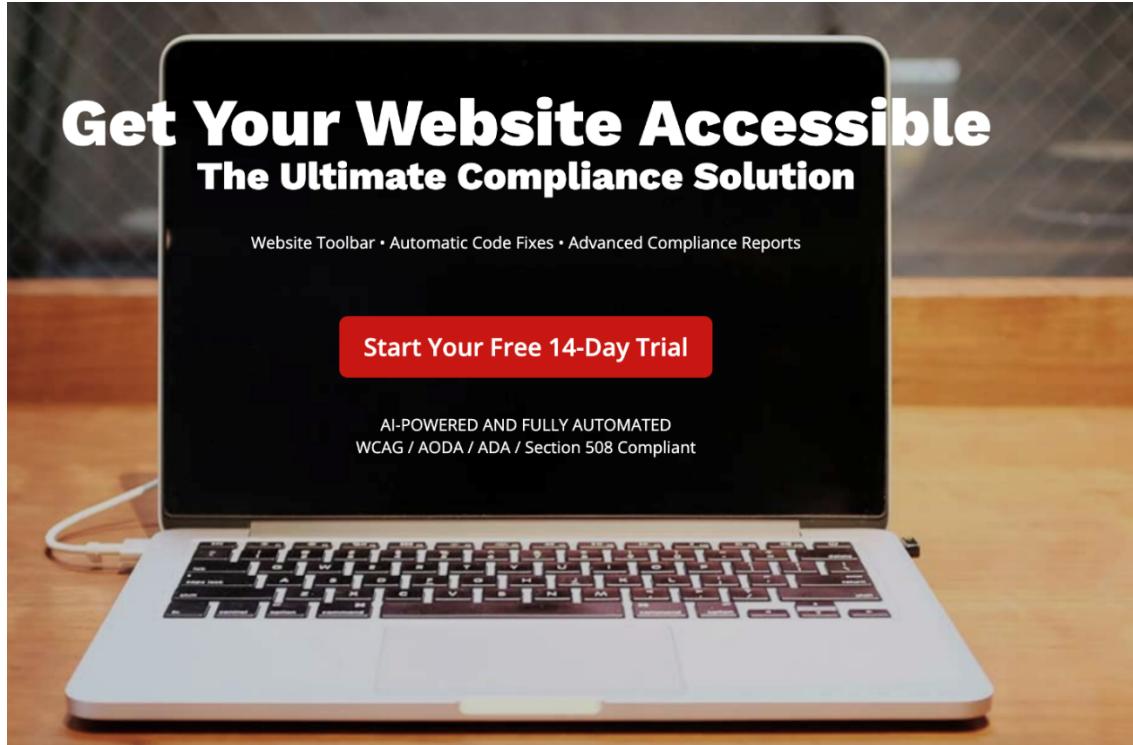


Figure 58: Get Your Website Accessible (Captured October 21, 2021)

The company's website also engages in some scare tactics claiming that their product can help a client avoid lawsuits and "Maintain the Highest Level of Compliance 24/7":

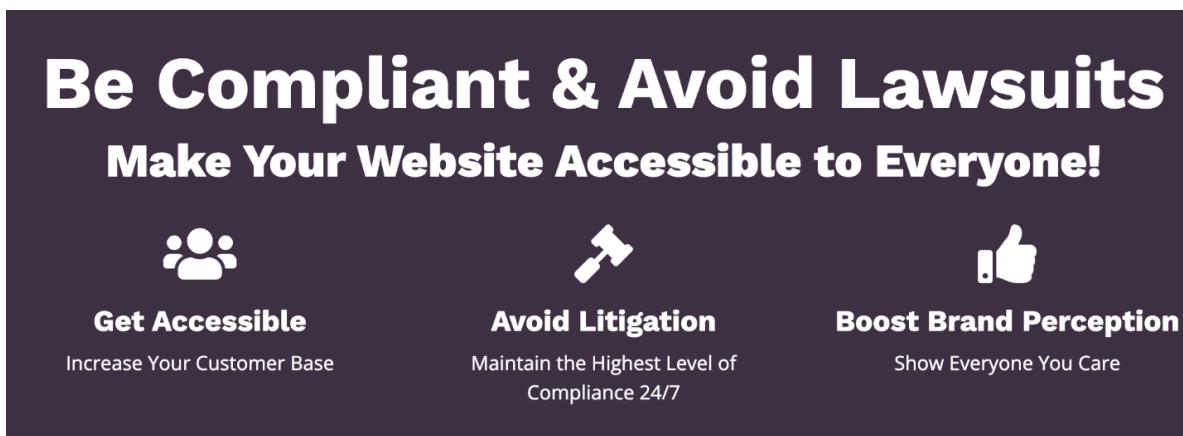
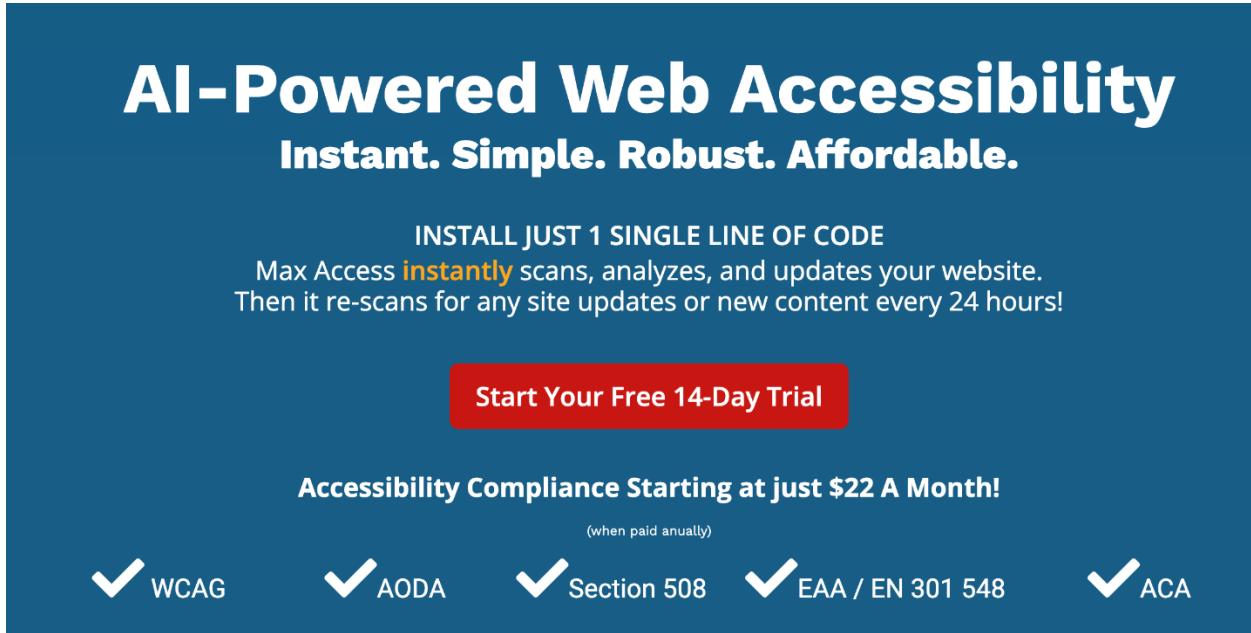


Figure 59: Be Compliant & Avoid Lawsuits (Captured on October 25, 2021)

Like most of their peers, MaxAccess promises that by installing "just 1 single line of code" your website can be made compliant and stay compliant due to the product re-

scanning for new content every 24 hours:



The image shows a dark blue landing page for "AI-Powered Web Accessibility". At the top, it features the text "scanning for new content every 24 hours:". Below this is a large white section containing the heading "AI-Powered Web Accessibility" in bold, followed by the subtext "Instant. Simple. Robust. Affordable." in a slightly smaller font. A red button labeled "Start Your Free 14-Day Trial" is centered in this section. Below the button, the text "INSTALL JUST 1 SINGLE LINE OF CODE" is displayed in white. Underneath this, there is a description: "Max Access **instantly** scans, analyzes, and updates your website. Then it re-scans for any site updates or new content every 24 hours!" In the bottom right corner of the main content area, the text "(when paid annually)" is written in small white font. At the very bottom of the page, five icons with labels are aligned horizontally: WCAG, AODA, Section 508, EAA / EN 301 548, and ACA, each preceded by a white checkmark icon.

AI-Powered Web Accessibility
Instant. Simple. Robust. Affordable.

INSTALL JUST 1 SINGLE LINE OF CODE

Max Access **instantly** scans, analyzes, and updates your website.
Then it re-scans for any site updates or new content every 24 hours!

Start Your Free 14-Day Trial

Accessibility Compliance Starting at just \$22 A Month!

(when paid annually)

✓ WCAG ✓ AODA ✓ Section 508 ✓ EAA / EN 301 548 ✓ ACA

Figure 60: AI-Powered Web Accessibility

Evidence from Facebook

<https://www.facebook.com/digitalaccessibilityonline/>

The company claims that “Certification is the Only Accessibility Solution You’ll Ever Need,” although there is no recognized certification standard:

A screenshot of a Facebook post from the page "Online ADA". The post features a profile picture with a horse logo, the page name "Online ADA", the posting date "December 16, 2020", and a "See More" link. The main text reads: "Stuck in the sea of accessibility options? Can't figure out which solution is best? Worried about wasting your money on a solution that doesn't follow through on its promises? This article is for you. Book a free strategy call today! ... See More". Below the text is a large yellow trophy icon with a white star in the center. At the bottom of the post, it says "ONLINEADA.COM" and "Why Certification is the Only Accessibility Solution You'll Ever Need".

Figure 61: Why Certification is the Only Accessibility Solution You'll Ever Need (Captured October 25, 2021)

<https://www.facebook.com/digitalaccessibilityonline/posts/1974843319324858>

Evidence from Google Ads (source: SpyFu.com)

OnlineADA/ MaxAccess spends an estimated \$2736 on CPC ads per month.

86% of the MaxAccess.io website traffic comes from CPC ads

The company's Google ads claim that their product offers, "Accessibility in 1 Click," and can get your website, "Accessible in Minutes":

Get Your Website Accessible - Let AI Update Your Site

 <http://maxaccess.io/>

Be Compliant & Avoid Lawsuits . World Leading AI-Powered Web Accessibility Solution.
Accessibility in 1 Click. Detailed Reporting. Ongoing Compliance Mgmt. Get Accessible in Minutes.

Ad Position: 3 Date: October 2020

Figure 62: Get Your Website Accessible (Captured October 24, 2021)

MaxAccess uses the familiar lawsuit scare tactics in its ads:

Get Your Website Accessible - Fully Automated Solution

 <http://maxaccess.io/>

Be Compliant & Avoid Lawsuits . World Leading AI-Powered Web Accessibility...

Ad Position: 3 Date: July 2020

Figure 63: Fully Automated Solution

Make Your Website Accessible | Be Compliant & Avoid Lawsuits

 <http://maxaccess.io/>

World Leading AI-Powered Web Accessibility Solution. Accessibility in 1 Click. 14-Day Free Trial.
Ongoing Compliance Mgmt. Detailed Reporting. Expert Team.

Ad Position: 4 Date: May 2020

Figure 64: Be Compliant & Avoid Lawsuits

In addition to using the now all-too-familiar tactic of “protect[ing] your business from lawsuits,” this particular ad demonstrates the company’s unfamiliarity with actual accessibility by using the incorrect term “Alt-Tag”:

Figure 63: The #1 Fully Automated

Purple Lens

Address: Tel Aviv, Israel

Website: <https://purple-lens.com>

“We are a team of entrepreneurs, web-developers, UX/UI designers and physicians based in Israel. We are dedicated to finding a solution that makes websites more usable for 20% of online users in order to create equal opportunities.

For years, web accessibility has been an issue for almost any type of online business that struggled to gain new visitors and customers. A majority of sites work on WordPress and since the Israeli legal requirements for website inclusivity are particularly strict, we set a goal to make all WordPress sites accessible, whatever it takes.

We invested a huge amount of time and energy, eventually creating today’s most advanced solution. Our assistive technology has been implemented in numerous projects for the Israeli Government and multiple local businesses. Today, thousands of Israeli websites use our assistive technology and now we are ready to go global.”

(<https://purple-lens.com>)

Evidence from Website

The company claims that its product will allow a personalized UX for “EVERY user” (emphasis theirs) and promises “AA accessibility compliance”:

The screenshot shows the homepage of the website. At the top left is a purple circular logo with a stylized 'P' and a person icon. To its right, the text "HI! WE ARE PURPLE-LENS!" is displayed in large, bold, purple letters. Below this, there is a block of text: "Boosting your website performance by personalizing to EVERY user is our mission. Best assistive technology whilst keeping the lowest costs for any web owner! Reach a massive untapped audience, share more content and increase sales conversion rates worldwide! Achieve real accessibility by a specialized process. Save immediately". Below this text are four bullet points, each preceded by a purple circle with a checkmark: "Unique commerce and blog solutions!", "AA accessibility compliance", "Purple : put on the purple coat and do it yourself!", and "Leading support ...". At the bottom of the page are two buttons: "Try For Free" and "Our Packages".

Figure 65: *Hi! We are Purple Lens!* (Captured October 25, 2021)

For less than \$16 per month, Purple-Lens claims that their product can “Achieve 100% AA Compliance”:

The screenshot shows a section titled "FOLLOW OUR ROADMAP. ACHIEVE 100% AA COMPLIANCE." at the top. Below this, there is a diagram consisting of three overlapping circles. The top-left circle is purple and contains the text "\$10 /mo" and "Basic Plan". The bottom-left circle is white and contains the text "Content Sites". The bottom-right circle is purple and contains the text "\$13 /mo" and "WooCommerce". The top-right circle is purple and contains the text "\$16 /mo" and "WooCommerce".

Figure 66: *Follow Our Roadmap* (Captured October 25, 2021)

UserWay

Address: 1007 North Orange St. 10th Floor Wilmington, DE, 1980, USA

Website: <https://userway.org/>

"UserWay creates advanced website accessibility solutions that help ensure ADA compliance without refactoring your website's existing code."

With UserWay's RaaSTM (Remediation as a ServiceTM) technology you can effortlessly increase compliance with WCAG 2.1, ADA, ATAG 2.0, EN 301-549, and Section 508 regulations as required by US & international governmental & regulatory bodies."

(<https://userway.org/about/>)

Evidence from Website

On its website, UserWay claims its solutions "provide full WCAG & ADA compliance from day one" and protects its clients from "accessibility-related lawsuits":

The screenshot shows the UserWay homepage. On the left, there are three white callout boxes with icons and text:

- WCAG & ADA Compliance** (Icon: hands shaking): UserWay's solutions provide full WCAG & ADA compliance from day one, and every single day thereafter.
- Mitigate Legal Risk** (Icon: shield): Protect your website from accessibility-related lawsuits with the world's strongest automated solution for accessibility.
- Enhanced Usability & UI/UX** (Icon: target): Accessibility sets your website apart and showcases your commitment to inclusion - all while boosting SEO, search rankings, conversions and your bottom line.

To the right, the main headline reads **UserWay Makes Accessibility Easy**. Below it is a link to "Watch our demo to learn how." A video player window shows a man in a blue shirt standing at a desk, with a play button icon in the bottom right corner. At the bottom center is a blue "Start Free Trial" button.

Figure 67: UserWay Makes Accessibility Easy (Captured October 24, 2021)

WCAG & ADA Compliance



UserWay's solutions provide full WCAG & ADA compliance from day one, and every single day thereafter.

Mitigate Legal Risk



Protect your website from accessibility-related lawsuits with the world's strongest automated solution for accessibility.

Enhanced Usability & UI/UX



Accessibility sets your website apart and showcases your commitment to inclusion - all while boosting SEO, search rankings, conversions and your bottom line.

Figure 68: WCAG & ADA Compliance (Captured October 24, 2021)

The company claims its customers can “avoid lawsuits with only a single line of code” and that their solution is “[t]rusted by more than 1,421,130 websites” and is backed by a \$1 million guarantee:

The #1 Web Accessibility Solution for WCAG & ADA Compliance

- ✓ Get compliant & **avoid lawsuits** with only a single line of code
- ✓ The strongest legal mitigation with a **\$1 million guarantee**
- ✓ Trusted by more than **1,421,130 websites**, including



Figure 69: The #1 Web Accessibility Solution

UserWay's website also uses the familiar legal scare tactics:

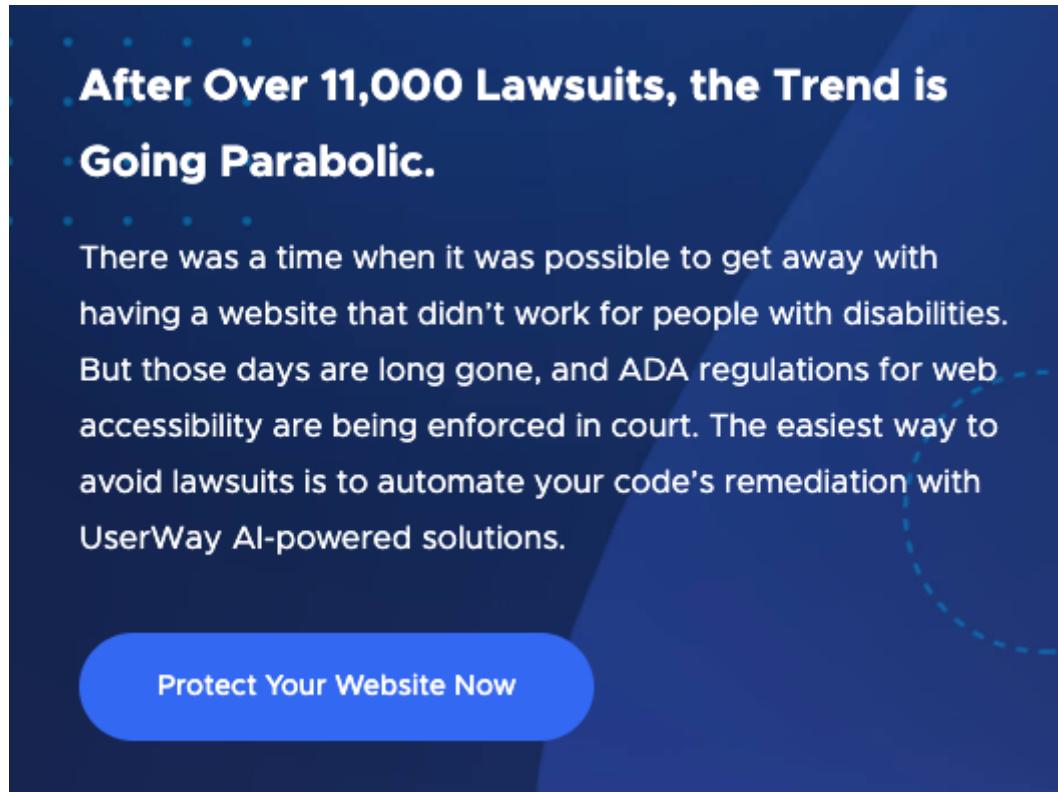


Figure 70: The Trend is Going Parabolic

The FAQ section of the website also claims the product “provides full ADA and WCAG 2.1 compliance”:

Frequently Asked Questions

Get your FAQs answered below or [contact us](#) for a deep dive today

Does UserWay provide full ADA compliance?

Yes, [UserWay's AI-Powered Accessibility Widget](#) provides full ADA and WCAG 2.1 compliance and costs as little as \$49/month. Our solution is unique in the industry, as we don't require you to change your website's existing code in order to achieve compliance.

Figure 71: Does UserWay provide full ADA compliance? (Captured October 24, 2021)

The FAQ also claims that using UserWay's widget, a client will "luckily" not need their assistance with demand letters or lawsuits (which itself seems to undermine its claims to protect against them), but in the case a client does receive such a legal challenge, UserWay will provide what we consider a legally useless "Statement of Compliance" as proof of a site's accessibility:

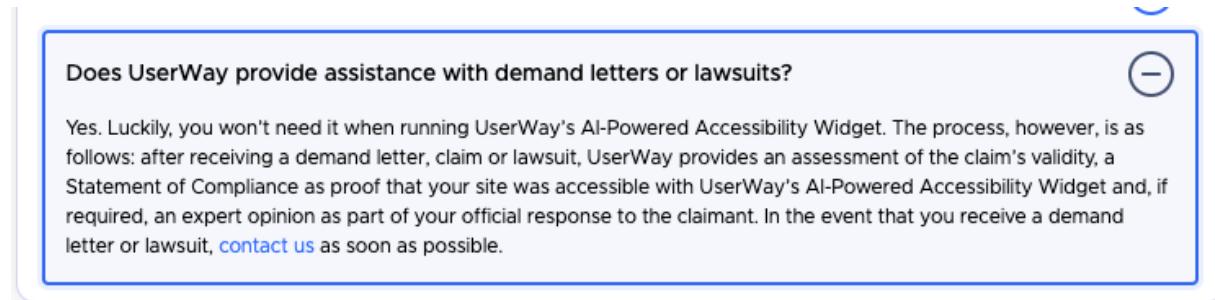


Figure 72: Does UserWay provide assistance with demand letters or lawsuits? (Captured October 24, 2021)

Evidence from Email

In their direct marketing emails, UserWay promises that their widget gives "full (emphasis theirs) WCAG coverage" and can make a site "completely ADA-compliant":



We're counting down the days to Black Friday, one of our favorite times of the year!

C. L.,

There's no better time to get your site completely ADA-compliant and way more accessible while saving a nice chunk of change.

Adding UserWay's comprehensive AI-Powered Widget to your website gets you **full** WCAG coverage.

This Black Friday, you're guaranteed to save **at least \$147.**

ADA compliance is the law. Don't miss out on this deal!

Figure 73: Black Friday Deal (received and captured November 19, 2021)

Evidence from Twitter

UserWay makes the bold claim that its screen reader is better than "standard screen readers" because it "is engineered specifically for websites":

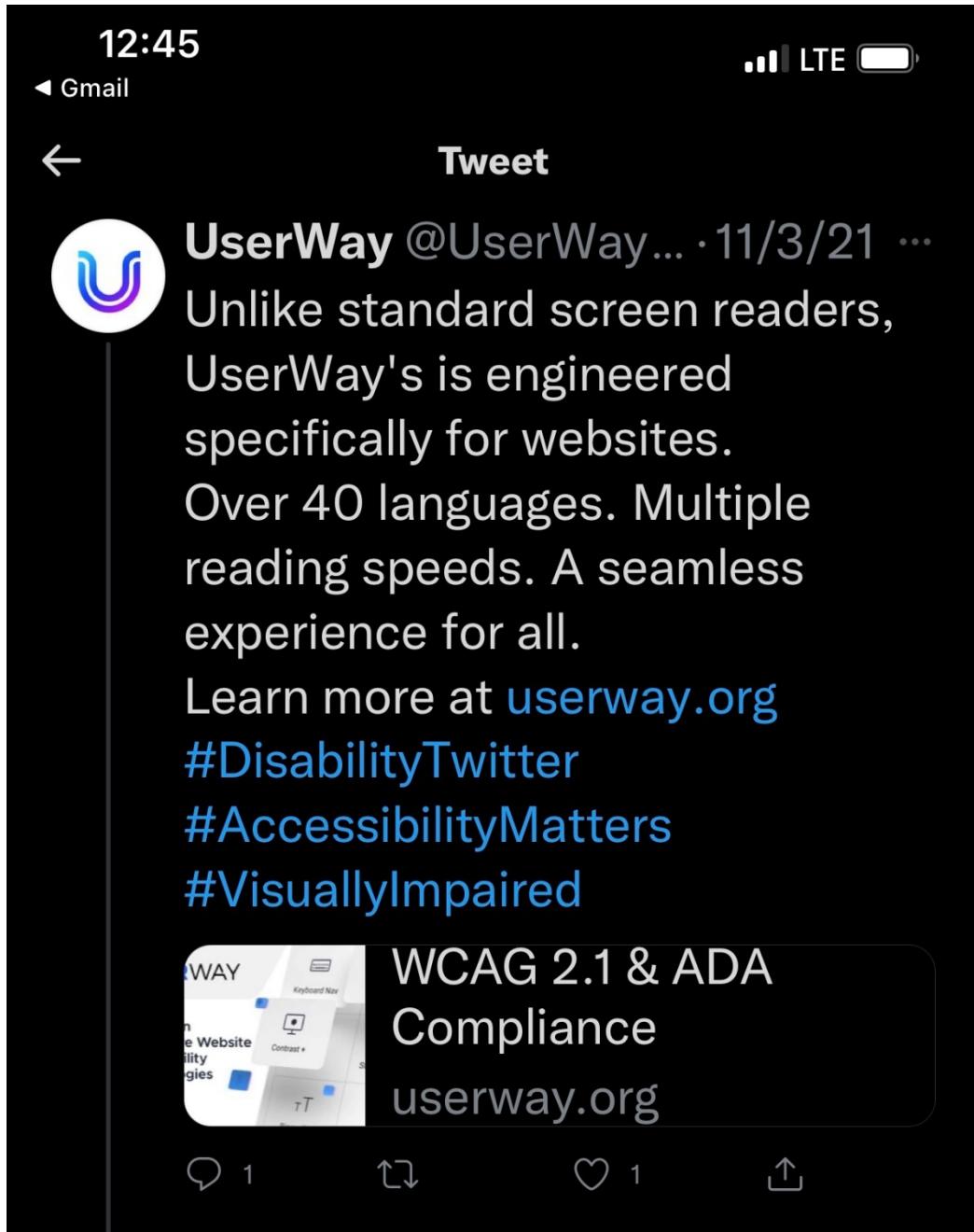


Figure 74: UserWay's Screen Reader (Captured on November 3, 2021)

Evidence from Facebook

<https://www.facebook.com/UserWay>

On Facebook, the company claims that it can magically make all sites compliant "in a flash":

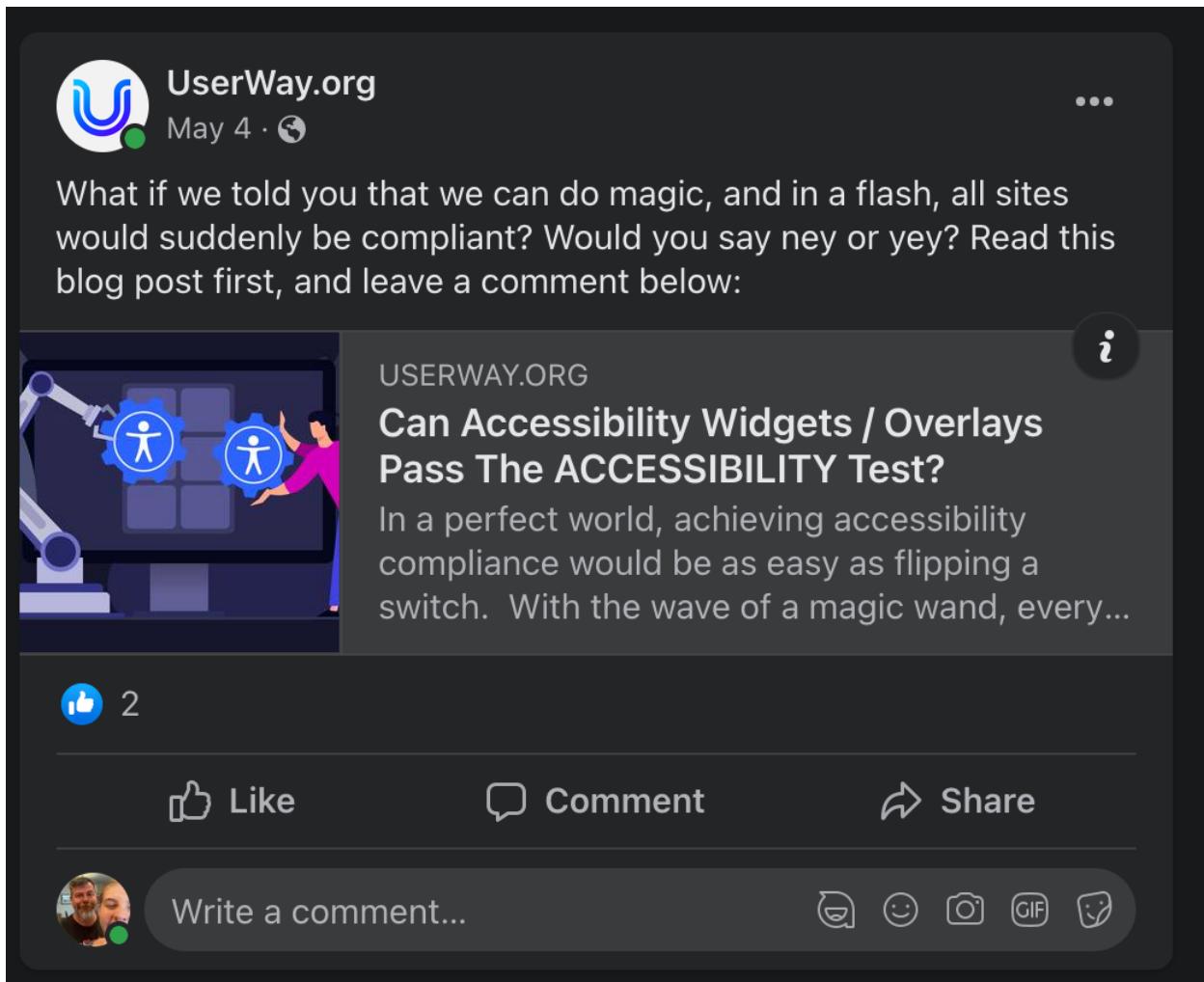


Figure 75: Can Overlays Pass the Accessibility Test? (Captured October 24, 2021)

<https://www.facebook.com/UserWay/posts/2906487569592368>

UserWay continues to push the “one line of code” solution as a viable one:

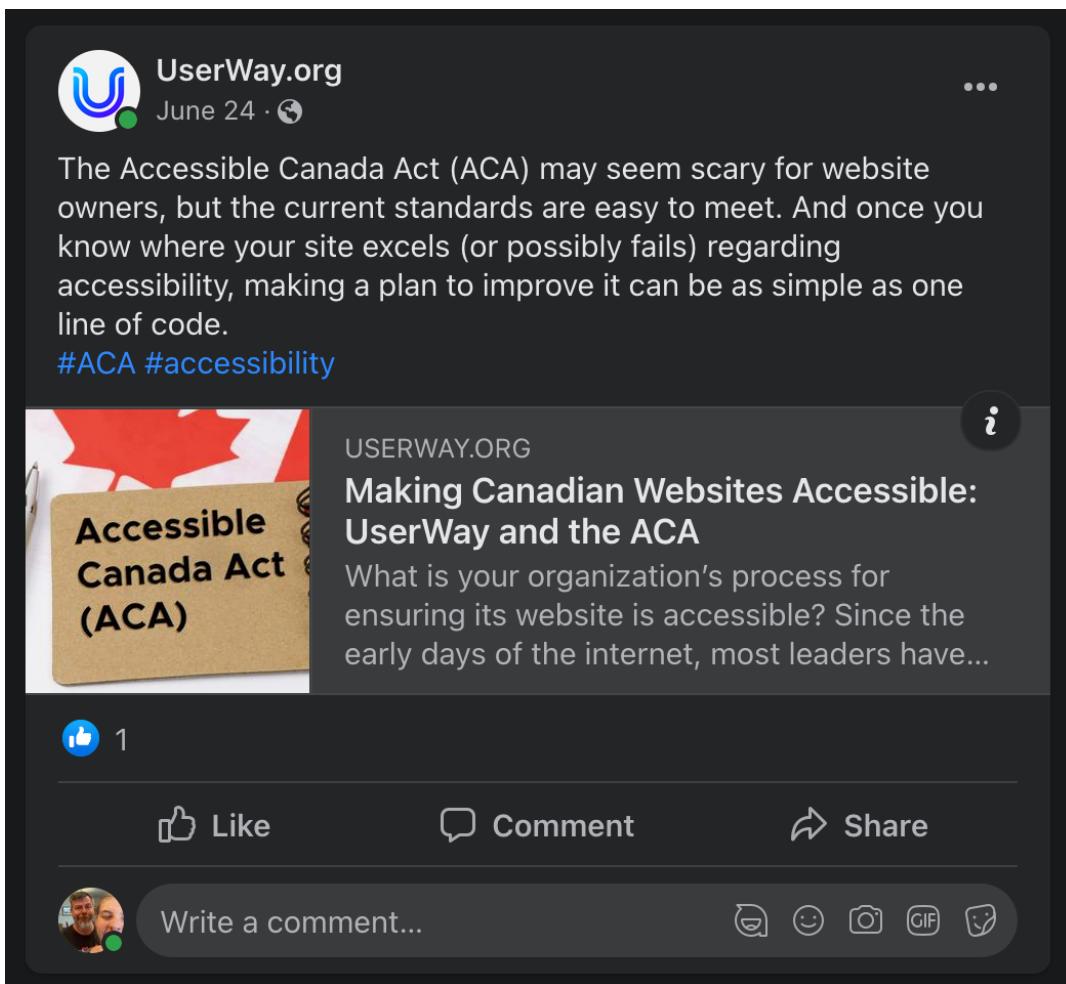


Figure 76: Accessible Canada Act
<https://www.facebook.com/UserWay/posts/2942545285986596>

For e-commerce platforms, the company claims that its product will make their sale prices "automatically...accessible". Ironically, the linked video does not have an audio description so is, itself, inaccessible to screen reader users:

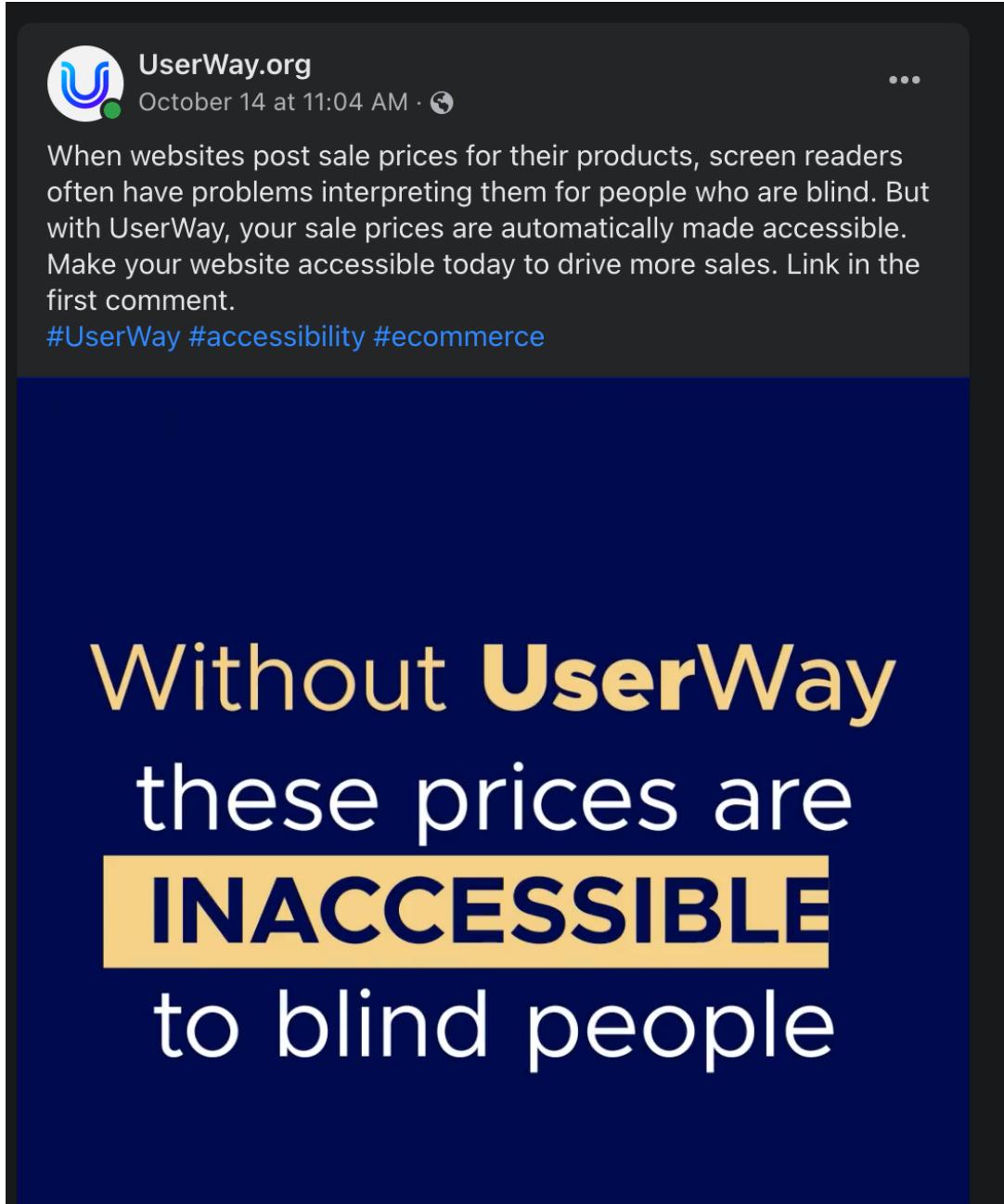
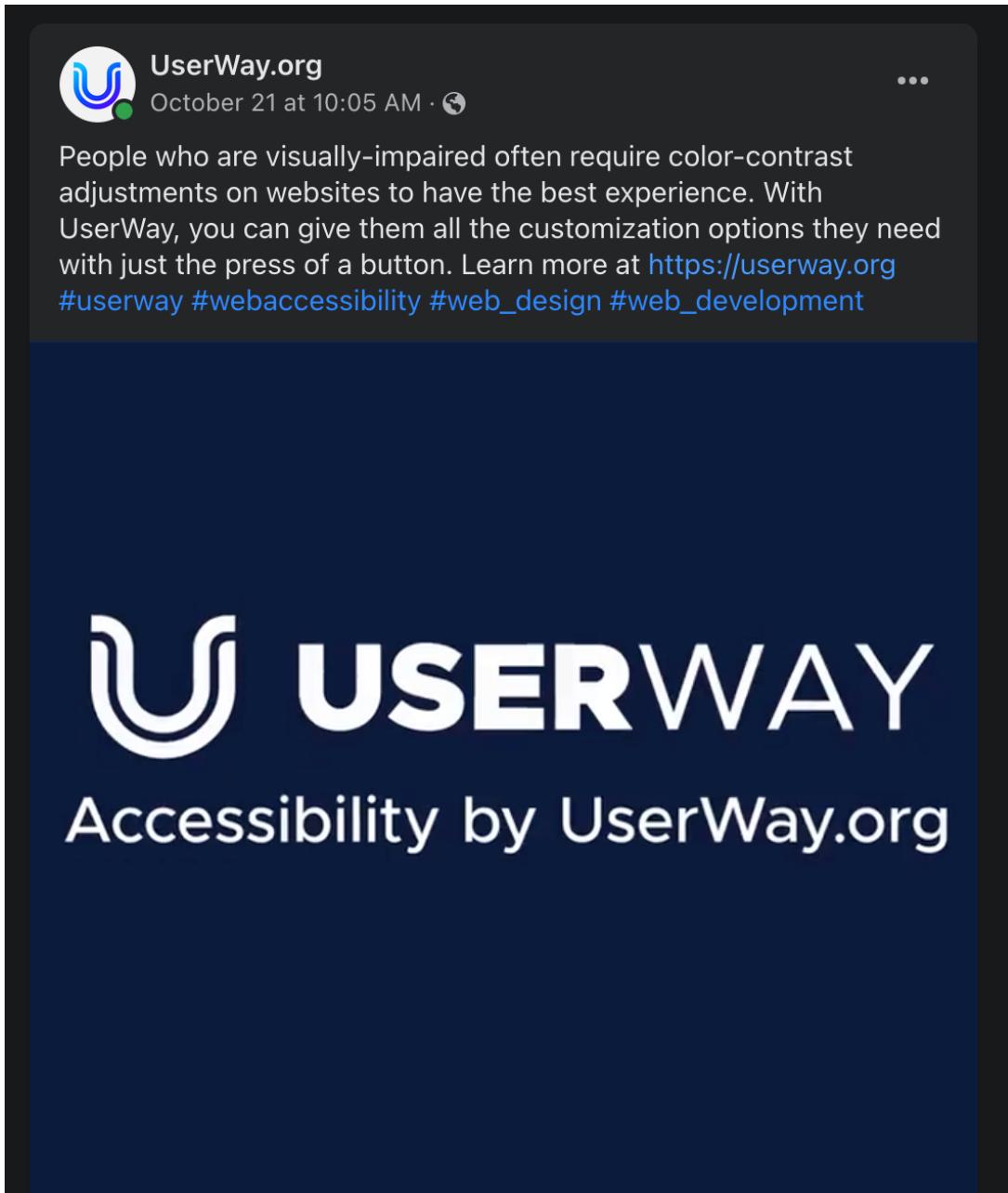


Figure 77: Sale Prices
<https://www.facebook.com/UserWay/videos/295124915776001/>

The company claims its product will make “all the [color contrast] customization options” with one click:



The company also claims its product can be beneficial to Shopify store owners and "ensure their shops are inclusive":

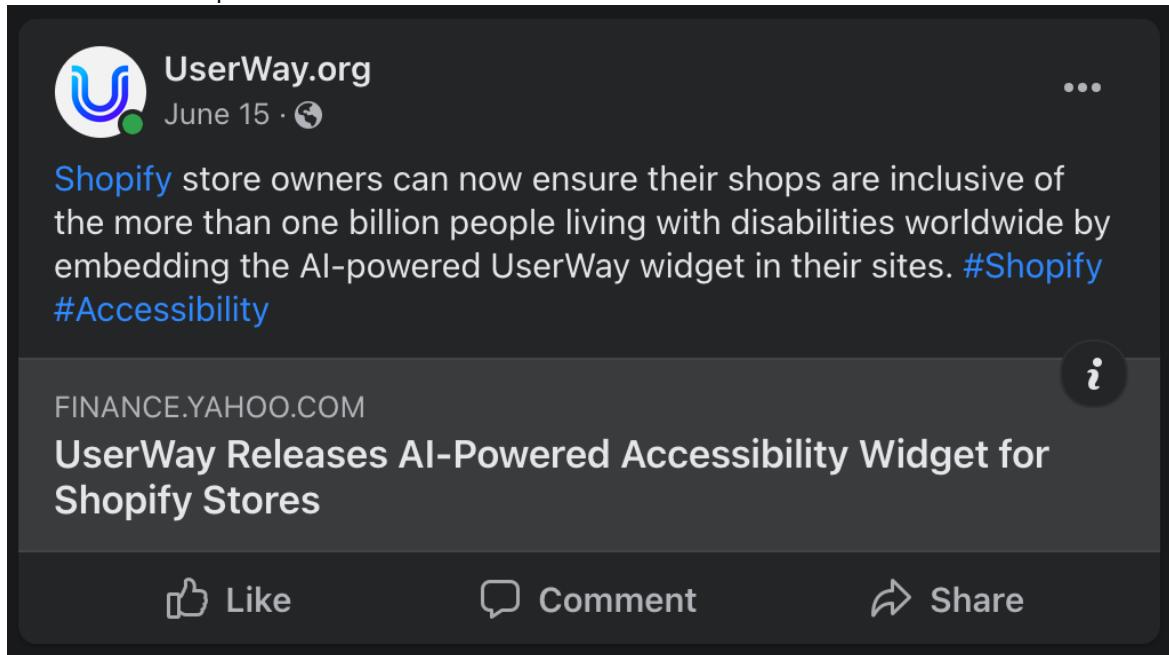


Figure 79: Shopify Widget (Captured on October 24, 2021)
<https://www.facebook.com/UserWay/posts/2906487569592368>

Evidence from Google Ads (source: SpyFu.com)

UserWay spends an estimated \$6057 on CPC ads per month.
15% of the UserWay website traffic comes from CPC ads

On its Google Ads, UserWay claims that "ADA & WCAG 2.1 Compliance" can be achieved with "No Changes to Your Website's Code."

[Website Accessibility Checker - Website Accessibility Tester](#)

<http://userway.org/>

No Changes to Your Website's Code. Fully-Automated. Protect Your Business From Lawsuits.
No Changes to Your Website's Code. Supported by The Top Website Creation Platforms. ADA & WCAG 2.1 Compliance.

Ad Position: 4 Date: September 2021

Figure 80: Google ad (Captured September 2, 2021)

These ads continue peddles the lie that “ADA & WCAG compliance” can be achieved with “[n]o changes to your website’s code”:

ADA Compliance - Website Accessibility - userway.org

 <http://userway.org/>

No Changes to Your Website’s Code. Automated Solution. Protect Your Business From Lawsuit. The World’s Leading Automated Website Accessibility Solution for ADA & WCAG Compliance. View Pricing. Request

Ad Position: 1 Date: March 2021

Figure 81: ADA Compliance - Website Accessibility (Captured September 2, 2021)

ADA & WCAG Compliance - Make Your Website Accessible

 <http://userway.org/>

The World’s Leading Automated Website Accessibility Solution for ADA & WCAG Compliance. No Changes to Your Website’s Code. Supported by The Top Website Creation Platforms. Trusted by Over 60M Users. I

Ad Position: 1 Date: August 2021

Figure 82: ADA & WCAG Compliance (Captured September 2, 2021)

The company also touts that its “powerful AI” can fix inaccessible sites automatically:

Web Accessibility with UserWay - ADA, WCAG 2.1 & Section 508

 <http://userway.org/>

From governments to leading brands, over 740k sites trust UserWay for their accessibility. UserWay’s powerful AI identifies and resolves inaccessible content automatically. Request A Demo. View Team.

Ad Position: 2 Date: March 2021

Figure 83: ADA, WCAG 2.1 & Section 508 (Captured September 2, 2021)

UserWay claims its solution can protect its clients' "business from lawsuit[sic]" make a website "Lawsuit-Free" with the familiar "no changes to your website's code" line:

Website Accessible Lawsuit-Free - Automated Website Accessibility

 <http://userway.org/>

The World's Leading Automated Website Accessibility Solution for ADA & WCAG Compliance.
No Changes to Your Website's Code. Automated Solution. Protect... Pricing - Start 10-Day Free Trial - Accessibil

Ad Position: 3 Date: April 2021

Figure 84: Lawsuit-Free (Captured September 2, 2021)

WCAG 2.1 & ADA Compliance - #1 Website Accessibility

 <http://userway.org/>

No Changes to Your Website's Code. Automated Solution. Protect Your Business From Lawsuit. Join 1,000,000 Websites Already Using UserWay & Make Your Website Accessible to Everyone. View Pricing. Get A

Ad Position: 2 Date: May 2021

Figure 85: #1 Website Accessibility (Captured September 2, 2021)

Automated Web Accessibility - World's Leading Solution

 <http://userway.org/>

Join 1,000,000 Websites Already Using UserWay & Protect Your Website from Lawsuits. No Changes to Your Website's Code. Supported by The Top Website Creation Platforms. Installed on 1M Websites.

Ad Position: 1 Date: July 2021

Figure 86: Automated Web Accessibility

Evidence of other anti-competitive behavior

UserWay's widget interferes with automated web accessibility tools such as WAVE, even pointing the user to using the company's own "UserWay Inspector" instead of whichever tool the user chooses:

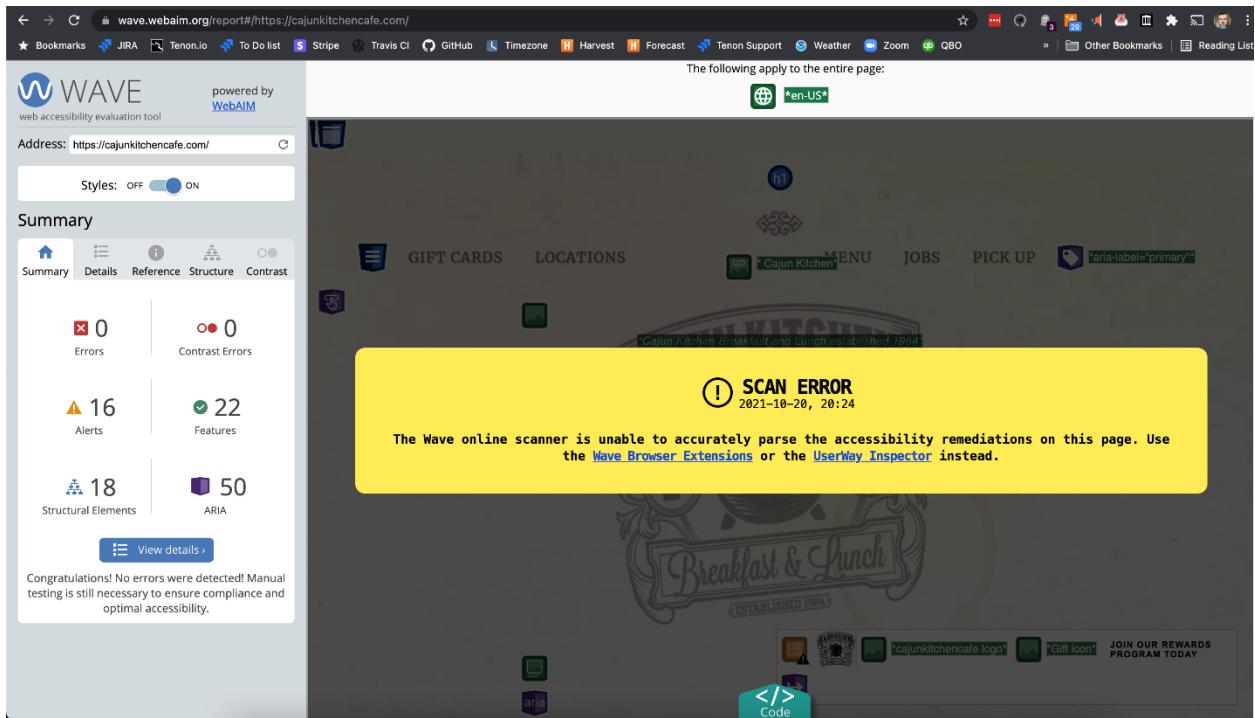


Figure 87: UserWay - WAVE Scan Error (Captured October 20, 2021)