

EXHIBIT NO. 1

30
9-14-02

Docket Item # 24
TEXT AMENDMENT #2002-0004

Planning Commission Meeting
September 3, 2002

CASE: TEXT AMENDMENT #2002-0004
ATM REGULATIONS

ISSUE: Consideration of an amendment to Section 7-1800 of the Zoning Ordinance to revise the automatic teller machines (ATMs) regulations within the Historic Districts of Alexandria.

PLANNING COMMISSION ACTION, SEPTEMBER 5, 2002: On a motion by Mr. Robinson, seconded by Mr. Komoroske, the Planning Commission voted to recommend approval of the request, subject to compliance with all applicable codes, ordinances and staff recommendations. The motion carried on a vote of 7 to 0.

Reason: The Planning Commission agreed with the staff analysis.

Speakers:

David Olinger, Old Town Civic Association, spoke in support.

STAFF RECOMMENDATION: Staff recommends that the Planning Commission on its own motion initiate the following text amendment:

ARTICLE VII: SUPPLEMENTAL REGULATIONS

Sec 7-1800 *Installation of ATM and similar machines on the exterior of buildings in the Historic Districts.*

- (A) Within the Old and Historic Alexandria District and the Parker Gray District, machines for dispensing money, tickets, postage, and similar paper records, and providing electronic transactions and services, but not to include the sale or provision of other products or merchandise or lottery tickets, may be installed on the exterior of a building, or as an outdoor freestanding machine, provided:
 - (1) The director determines that the installation is consistent with each of the following minimum criteria:
 - (a) No machine may be installed on the exterior of a contributing structure to the district as determined using the Secretary of Interior's Guidelines. A list of noncontributing structures within each District is maintained by the Department of Planning and Zoning.
 - (b) No more than one machine may be installed per individual building.
 - (c) No freestanding machine may be installed outside of a completely enclosed space within the interior of a building, unless located within an open court or similar area within the footprint of a noncontributing building.
 - (d) No machine shall face residentially zoned land.
 - (e) ~~No machine shall exceed a maximum size of 37 inches in height and 23 inches in width, or the minimum size commercially available, whichever is smaller. The exterior surface of the machine shall not exceed 8.0 square feet in size.~~

- (f) ~~Signage shall be as small as possible, and no greater than a total area of 6.5 square feet. One bank identification sign shall be allowed abutting the top of the machine. The width of the sign shall not exceed the width of the machine and the height of the sign shall not exceed one-third of the width of the machine. Backlit signs shall not be permitted.~~
 - (g) No surround shall be permitted. Network logos may be displayed provided they are contained within the borders of the machine or the bank identification sign and a monochromatic (gray scale) color scheme is used.
 - ~~(g)~~(h) Lighting elements shall be the minimum possible to meet safety requirements, and may not exceed 2.0 foot candles measured at a radius of five feet from the source.
 - ~~(h)~~(i) The building on or within the foot print of which the machine is located shall be located in a commercial zone.
- (B) The installation of the machine, including without limitation its specific size and location and the extent of its signage and lighting, shall require approval by the Board of Architectural Review pursuant to Article IX and X of this ordinance.

Underlining indicates proposed new text. ~~Strikeout~~ indicates text to be deleted.

BACKGROUND

This text amendment addresses the issue of automatic teller machines (ATMs) in Old Town and recommends revisions to the existing regulations. Determining appropriate requirements for ATMs is challenging given the changing technology in the industry, the importance of the historic districts, and the need for wide input on the ultimate regulations. Nevertheless, with assistance from outside consultants and after review by interested civic and industry representatives, staff believes the proposed text changes being presented here represent a balance of interests: the proposed new regulations would limit ATMs to small machines with limited signage, but will allow for commercially available machines that comply with the American for Disabilities Act (ADA).

History

In the mid 1990s, then new ATM technology brought an onslaught of machines to the exterior of buildings in Old Town. To address growing concerns about the compatibility of the machines with the architecture of the City's historic districts, City Council formed a task force composed of Board of Architectural Review (BAR) members and industry representatives to consider legal restrictions on machines. The result of that work was the adoption in 1998 of the city's current ATM regulations, which are found at section 7-1800 of the zoning ordinance (TA 98-0013). Most of the machines that exist in Old Town today were installed prior to the adoption of those regulations, and were grandfathered by the new regulations.

In 1999, the first machine to be installed under the new regulations, the Virginia Commerce Bank ATM at 506 King Street, raised the issue of whether the adopted rules were feasible for banks. Specifically, in September 1999, City Council asked staff to study whether the size requirements in the zoning ordinance should be modified to accommodate commercially available machines consistent with industry and ADA requirements.

In September 2000, the Planning Commission considered but did not recommend approval of a text amendment which proposed to change size requirements for ATMs. The Commission deferred the matter for further study, citing specific concern about the existence of commercially available machines smaller than the ones proposed in the regulations and concern that the process by which proposed regulations were developed did not include review by interested groups and citizens.

Process

In order to address the overall problem of designing appropriate regulations for ATM machines in Old Town, as well as the specific issues raised by the Planning Commission when it last considered the issue, Planning staff's recent work on ATM machines has been assisted by outside consultants. Working with Wallace Roberts & Todd (WRT), a nationally respected planning and design firm, with extensive experience developing regulations for local government, planning staff sought both research and design assistance. WRT's Research Memorandum (Attachment 1) presents a thorough discussion of trends in the banking industry, and issues related to location, size, signage, design, lighting and ADA requirements for ATM machines.

Working with WRT, staff then convened a work group composed of citizens and representatives of concerned organizations to review the research and design options for ATM machines. Representatives of the following groups were included: the BAR-OHAD, the Planning Commission, the Commission on Persons with Disabilities, Old Town Civic Association, Upper King Street Civic Association, the Alexandria Chamber of Commerce, and the banking industry (see Attachment 2.) The work group met at a lengthy session on July 10, considered alternatives presented by the consultants (Attachment 3) and developed a clear consensus regarding proposed regulations for ATM machines in Old Town(Attachment 4.) Staff supports the findings of the work group, and they form the basis of the revisions staff is recommending in this text amendment.

At its meeting of August 21, 2002, the BAR-OHAD voted unanimously to support the proposed text amendment.

PROPOSED REGULATIONS

The text amendment proposed here retains most of the existing regulations. Specifically, the requirements related to the location of machines, the process for approval and the need for lighting and ADA compliance will not change. What is proposed as revisions are requirements related to the size of machines and the signage, design and visual impact of the overall installation. Each of the following ATM issues relate to the existing and proposed regulations, and is discussed in greater detail in the attached memoranda submitted by WRT.

Application

The regulations governing ATMs under section 7-1800 have applied and will continue to apply only to proposed machines within the City's historic districts. Machines installed elsewhere in the city are not regulated by the zoning ordinance, although they are required by law to comply with the federal ADA requirements.

Process

In order to install an ATM in the historic districts, a proposal must meet certain minimum criteria in the zoning ordinance, as determined by the Director of Planning. If the ATM meets those criteria, then, in addition, the proposed machine, with signage and lighting, must be approved by the BAR as an exterior alteration to a building in the historic district. These requirements will remain the same under the proposed regulations.

Location

The existing zoning regulations include extensive restrictions on the location of ATMs in the historic districts, including the following: machines are allowed only on "noncontributing buildings" (buildings without historic significance to the historic district); only one machine is permitted per

building; machines may not face land zoned for residences; and a freestanding machine may not be installed except within a completely enclosed space within the interior of a building or within an open area within the footprint of a noncontributing building. These locational limitations will not change under this text amendment. One point that was made, as an enhancement to existing regulations, was to emphasize the importance of the street facade of buildings in the historic district, and the interruption to the streetscape that machines can create. The work group expressed its clear preference for the location of machines within alcoves or on a wall perpendicular to the street as opposed to on a wall facing the street.

Size

The existing zoning regulations limit the size of an ATM to a maximum of 23" (width) by 37" (height). Full service machines of this size are not commercially available. According to the research conducted for this study, the three smallest full service machines currently available are the following sizes:

NCR:	27.8" x 32.6"	(6.2 sq. ft.)
Fujitsu:	29.7" x 38"	(7.8 sq. ft.)
Diebold:	31.75 x 42"	(9.2 sq. ft.)

The proposed text amendment would allow a machine to be a maximum of eight square feet. This change is necessary to accommodate machines that are commercially available. Another revision regards the way the size limitation is described. Instead of prescribing specific height and width dimensions, an overall dimension (eight square feet) is used instead in order to allow for installation requirements, to allow for slight changes in machine dimensions in the future and to provide some flexibility to banks. Under the new eight square feet dimension requirement, the currently available Diebold machine would not be allowed, although there is a cash dispensing Diebold machine that would fit the new regulation. For more detail and to review the alternatives presented to the work group, see attached WRT research and memoranda attachments.

Signage

As has been noted in prior staff reports, although the size of each machine is of concern, the most significant aspect of ATMs with regard to their visual impact and compatibility with the historic district is their attendant signage. The existing requirements regulate signage in two ways. First, total signage of all types is limited in size to a maximum of 6.5 square feet. Second, the regulations suggest that the signage be "as small as possible." The Planning Commission has noted the difficulty in applying the existing language in the past, and staff recommends a different approach to signage.

The proposed text amendment allows one identification sign for the bank's name, and requires that it be installed at the immediate top of the machine. It's size would be limited to the width of the

machine and to a height dimension equal to one third of the height of the machine. In this way, each bank is provided adequate identification, but the sign must be proportional to size of the machine. As is true of the current regulation, no backlighted signs are permitted. The proposed regulation eliminates the potential for peripheral, miscellaneous advertising, unrelated to the bank name, other than the required network logos, as discussed below.

Surround.

The material installed around an ATM as a border, known as a surround, tends to make machines appear larger than they are; the surround also creates an opportunity for unnecessary and unaesthetic signage. The surround area, unless decorated with specific signs, is not the subject of any restriction under the existing ATM regulations. After some debate about alternative approaches, the ATM work group determined that the best method of dealing with ATM surrounds was to eliminate them entirely. The group was persuaded by the fact that an adequate machine with signage can be achieved without a surround element. Therefore, the proposed regulations prohibit the installation of any surround.

The new text also provides that network logos, which are required by the industry and often found on surrounds in bright colors, may be displayed on the bank sign or the machine itself and only in a monochromatic (black and white) color scheme.

Lighting

The current regulations limit lighting to 2.0 foot candles and are not proposed to be changed. Although higher lighting standards have been applied elsewhere, existing ATM machines appear to be operating satisfactorily because of the ambient lighting on the street.

ADA Requirements

Regardless of the city's zoning ordinance, any new ATMs must comply with the federal requirements for accessibility regulated under ADA, and the manufacturers cited in the attached research all certify that their machines, including at the sizes being recommended, comply with ADA if installed correctly. No additional revisions are necessary to achieve compliance with ADA.

However, the Commission on Persons with Disabilities has been following closely proposed changes to ADA with regard to ATMs. After the work group met and finalized its thoughts, the Commission suggested to staff that this text amendment include additional regulations which anticipate some proposed but yet to be adopted revisions to ADA. Of special interest are proposals to require ATMs to include speech activated technology in order to make them more accessible to the blind (see Attachment 5.) The consultants from WRT had noted the proposed ADA changes in their research and discussed it with the work group, making the point that the machine size proposed in this text amendment is sufficient to accommodate the new technology.

Neither the work group nor staff is in a position to make a formal recommendation on whether to include the proposed new regulation in this text amendment, however. The work group is not scheduled to meet again, and staff is reluctant to opine, without significantly more research, on proposed ADA changes that have not been through the process designed to review such changes for the general public. In addition, staff is concerned about making audible machines a requirement for ATMs, but only on the exterior of buildings in Old Town, when the same requirement does not apply elsewhere in the city. The suggestion may be something that the Commission on Persons with Disabilities and the City decide to consider at a later date for citywide application.

STAFF RECOMMENDATION

Staff recommends that the Planning Commission initiate and recommend approval of the proposed text amendment to the ATM regulations for the historic districts.

STAFF: Eileen P. Fogarty, Director, Planning and Zoning;
Barbara Ross, Deputy Director.

Attachments:

1. WRT Research Memorandum, July 17, 2002.
2. List of members of workgroup
3. WRT Alternatives Memorandum/Graphics, August 22, 2002
4. WRT Work Group Findings Memorandum, July 12, 2002
5. Banking Journal article, June 1, 2002
6. Letter from Cardinal Bank, August 7, 2002
7. Letter from Virginia Commerce Bank, August 8, 2002



Memorandum

Text Amendment #2002-0004
ATMs Attachment 1

To:	Barbara Ross Deputy Director City of Alexandria Department of Planning & Zoning	Date:	Revised July 17, 2002
		From:	Wallace Roberts & Todd
		Ref. No.	02-3143-01
		Project:	Alexandria ATM Study
		Pages:	2
		Re:	Research Results

CC:

The attached paper describes the results of our research into Automated Teller Machine (ATM) products and associated issues related to developing amendments to Alexandria's existing regulations for ATM installations in historic districts. Some of our key findings include:

- The minimum full service, through-the wall ATMs currently available from the three manufacturers are as follows (machine exterior surface area):
 - NCR : 27.8" x 32.6"
 - Fujitsu: 29.7" x 38"
 - Diebold: 31.75" x 42"

Alexandria's current regulations call for a maximum size of 23" in width and 37" in height or the minimum size commercially available, whichever is less.

- As was evident from our field survey of existing ATMs in Alexandria's historic districts, the major visual impacts of ATMs derive not from the machine itself but from its surround, including elements such as signage, network logo displays, and lighting. However, the size of the surrounding elements typically increases in proportion to the size of the machine. Alexandria's current regulations do not address design of the surround other than size and illumination of signage.
- Lighting/security is an important concern for banking institutions. Unlike Maryland and other states, Virginia does not have standards to address this issue. Alexandria's current regulation (no more than 2.0 foot candles measured at a radius of five feet from the source) is much stricter than Maryland's (10 foot candles within a 10' radius and 2 foot candles within a 50' radius), which is the de facto industry standard.
- Software compatibility was raised as a possible issue during the kickoff meeting for this study. However, all industry representatives interviewed report that software/operating systems do not affect the physical size or location of ATMs.
- Alexandria's current regulations do not address accessibility to ATMs for persons with disabilities. However, banks have been required to comply with accessibility guidelines under the Americans with Disabilities Act (ADA) for many years.

C:\My Documents\ATM Research memo and paper-revised.doc



Memorandum

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Changes to the ADA guidelines affecting ATMs are currently pending. The major change will require machines to have speech capabilities to better serve blind persons.

- No jurisdiction other than Alexandria was found to have explicit standards governing ATM installations. A number of jurisdictions regulate them on a case-by-case basis for visual impacts using historic district design guidelines that do not specifically address ATMs. These cases set ample precedence for the regulation of ATM location and design to protect historic values.
- The industry trend is that ATM installations in enclosed vestibules within bank buildings are increasing and exterior façade installations are decreasing in number.

Based upon our field survey of existing ATMs in Alexandria and consultation with other jurisdictions that regulate ATM installations in historic districts, we conclude that regulation is needed to prevent negative impacts on historic and aesthetic values. The key is to develop standards that will protect these values while making reasonable accommodation for ATM industry requirements. At the upcoming meeting on July 10 we will present alternatives for revising the current regulations based upon our research and field observations.

CITY OF ALEXANDRIA ATM DESIGN STUDY RESEARCH RESULTS

Automated Teller Machines (ATMs) have worldwide influence and provide more efficient revenue streams for banking institutions. The primary activity associated with ATMs is the dispensing of cash and currency. Most banking institutions prefer full-service ATM machines that not only dispense currency but also allow customers to make deposits and receive account information. In the future ATM machines will dispense coins, stamps, and tickets to events and process checks. Furthermore, some banking institutions have programmed ATMs to accept utility bill payments.

ATM manufacturers are working to design newer ATMs to use voice recordings, provide video interaction/advertising touch screens, and develop exterior components to serve an aging population. ATM manufacturers have for some time been required by the American With Disabilities Act (ADA) to provide Braille and to make ATMs accessible to the wheelchair bound. Many ATM manufacturers have also recognized that the aging 'baby-boom' generation will increasingly rely on design systems that provide better graphic resolution, larger ergonomic components, and voice technology.

The aesthetic of the ATM machine as it relates to the streetscape is not widely regulated. In fact, Alexandria was the only jurisdiction discovered to have explicit standards in place regulating ATM location and design.

To maximize profit and ensure return on investment, most ATMs are placed in high volume pedestrian or vehicle traffic zones and are designed to stand out as highly visible substructures within the streetscape. The greatest visual impact is produced by the "branding" of the ATM through its surround, including a sign identifying the banking institution and a display of the logos of credit cards accepted at the machine. The current industry trend, however, is towards installing ATMs within enclosed vestibules rather than in the exterior environment.

This paper presents the results of research on ATMs conducted through telephone interviews with ATM industry representatives, contacts with planning professionals, and Internet searches. The following issues are addressed:

1. Location
2. Machine Size
3. Security and Lighting
4. Existing Ordinances/Regulations
5. ATM Materials
6. ATM Operating Systems
7. ATM Surrounds/Environments/Bezels
8. ADA Requirements
9. Industry Trends

1. Location

The primary factor driving ATM machine location is profitability, as through-the-wall, full-service units cost between \$15,000 and 50,000 to purchase and up to \$15,000 to maintain annually. Specific factors influencing the choice of ATM site include building

location and design; pedestrian and vehicular volumes; security considerations; environmental conditions (noise, sunlight glare); etc.

Machine maintenance is another major consideration. Many banks prefer ATM machine designs that require rear entry service and cash replenishing. Typically, maintenance personnel need at least eight square feet of maneuvering room to service the machine. Banks also prefer that machines be serviced daily.

2. Machine Size

As noted, full-service machines that accept deposits, etc. are preferred in branch bank installations over machines that are limited to dispensing cash. The size of such machines vary according to manufacturer. The smallest machines available from the three manufacturers are as follows:

- NCR Personas 85: 27.8" x 32.6" exterior surface area
- Fujitsu 8040: 29.7" x 38" exterior surface area
- Diebold 1072ix: 31.75" x 42" exterior surface area without optional light, 31.75" x 49.25" with light

Diebold is the largest industry manufacturer and the one that appears to be most popular in Alexandria. The smallest through-the-wall machine manufactured by Diebold is a cash dispenser (not full-service) model (1071ix) that measures 25.875" x 42". Additional information and dimensions for these machines are provided at the end of the paper.

There is no indication that ATM sizes will become smaller in the foreseeable future.

3. Security

Lighting is one of the primary issues associated with ATMs. A number of states including Maryland, Oregon, Washington, New York, and Rhode Island require that specific lighting standards must be followed to ensure safety of ATM users. Virginia, however, does not have such a requirement. The State of Maryland standards, which are based upon the Illuminating Engineering Society of North America's Design Guide DG-9-97, are generally used by the industry. These standards are as follows:

- The first ten feet from the machine should be illuminated with at least 10 foot candles of light.
- Two foot candles of light are recommended for 50 feet beyond the immediate machine environment.

Another point of contention is the placement of security cameras to monitor the ATM machine. In many historic districts installers have been asked to conceal the cameras, which has resulted in innovative solutions. Some installers have had to place cameras high into a wall or attached to a ceiling, using concealed mirrors strategically placed to reflect the image of the ATM towards the lens.

Older security cameras will not work in variable lighting conditions. Newer cameras with automatic iris lenses adjust automatically to changing light levels. Minimum lighting requirements for different types of camera/surveillance systems are:

- Black and white surveillance video: .02 foot candles
- Color surveillance video: 2.5 foot candles
- PC based video system: 5.0 foot candles

The amount of lighting added by the contractor on site depends on the amount of lighting provided by the ATM, its surrounds, and the external environment.

4. Existing Ordinances/Regulations

The American Planning Association's Planners Advisory Service and all ATM manufacture and installation professionals interviewed were unaware of any existing ordinances or other regulations specifically regulating ATM installations in jurisdictions other than Alexandria. Certain design elements (predominantly related to lighting but also to signage, color, and style) are regulated in some jurisdictions based on historic district or other aesthetic design standards. Annapolis, MD is an example of a community that handles installations in its historic district on a case-by-case basis based upon the significance of the building involved. In general, the Annapolis Historic District Commission does not allow through-the-wall installations on contributing buildings. The Commission is more lenient with installations in non-contributing buildings, but the signage must be limited and lighting directed downward rather than outward. This latter requirement has stopped certain projects that were unable to comply with the State of Maryland lighting standards.

Charleston, SC and Savannah, GA are two other examples of cities that have addressed ATM installations in historic districts. Charleston will not allow any modification to an existing structure that visually impacts the public right-of-way. Any application for such a modification must undergo an extensive architectural review process, which has resulted in applications for ATM installations being denied. Savannah addresses ATM installations through its historic district signage regulations. ATM installers have been required to modify surround signage to accommodate the character of the district.

Typical regulatory approaches are based upon negotiation rather than explicit standards, with design review boards and banks compromising on a design that is deemed aesthetically acceptable without becoming cost prohibitive. In some cases banks may proceed with installations if agreement is not reached. Furthermore, the industry occasionally bypasses certain markets, locales, and districts due primarily to stringent design requirements.

5. ATM Materials

ATMs can be ordered with plastic fascia frames in charcoal metallic or off white (depending on the manufacturer) or stainless steel (only some manufacturers). The panels of the ATM are a factory fixed color. The color of the ATM fascia and panels can be changed at great initial and long-term expense to the bank. Due to wear from customer contact with surfaces, ATMs typically need to be touched up within a year (or six months for heavily used machines).

6. ATM Operating Systems

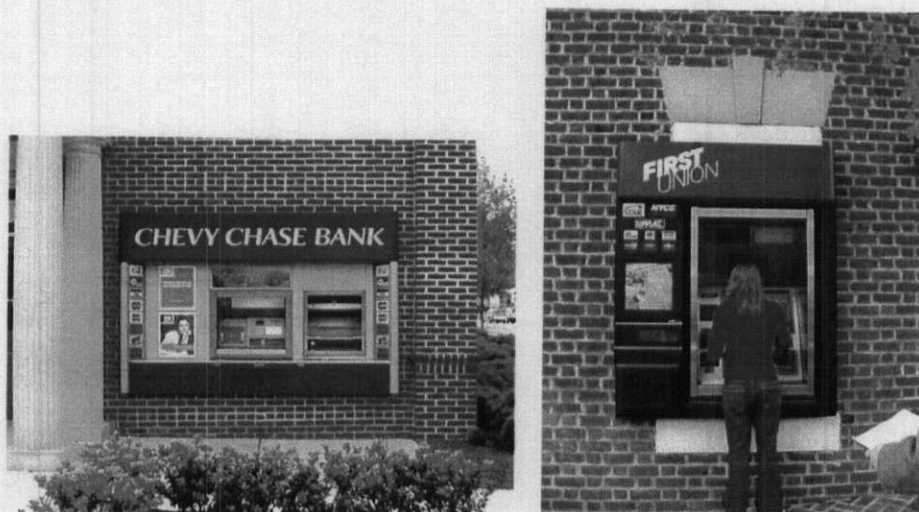
ATM software or operating systems require hardware similar in size to component hardware used for laptop and desktop computers. According to industry sources the operating systems necessary to conduct ATM operations have no bearing on the size and location of ATM machines.

7. ATM Surrounds/Environments/Bezels

The area around an ATM is referred to as a surround, environment, or bezel. This unit will have some or all of the following components:

- An illuminated sign "header" above the ATM (typically 4' by 2' in size) with the bank's name and/or primary ATM network predominantly displayed
- A network panel with as many as eight logos of the various financial networks and credit cards accepted at the particular ATM
- A POS (Point of Sale) panel (for non-ATM advertising such as interest and loan rates, new programs, or maps to the other bank offices)
- An envelope drawer or holder (used for envelopes on full service ATMs and brochures on cash dispenser ATMs)
- A waste receptacle¹
- A writing surface/purse shelf

Marketing is the primary function of the surround. The surround enhances the visibility of the ATM and serves to promote the image, brand awareness, and marketability of institution. A wide variety of colors, materials, and other design elements are used for the surround.



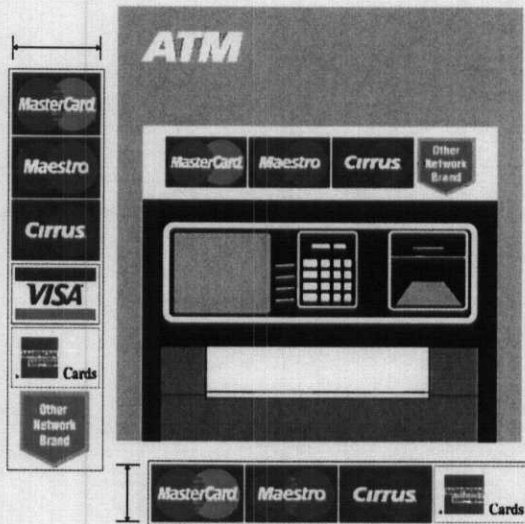
ATM Surrounds

Banks usually order surround elements separately from the ATM. Typically, marketing firms and ATM network suppliers develop, design, and package the surround environment. Some ATM manufacturers now provide surround packages and equipment services on a limited basis.

With respect to network logos, banks are contractually required to display the logos in accordance with the graphic standards of and subject to review by the networks. The

¹ It is best to have the waste slot too small to accept a cigarette or syringe. Many banks use a waste container at or near the ATM and separate from the surround.

standards require a minimum logo size of 2.5" in width. Monochromatic shading can be used as an alternative to the more familiar bright colors.



Network Logos



Monochromatic Logo

A design consideration related to but separate from the surround is the use of structural elements attached to the building to provide cover for the ATM. These structures can be visually prominent elements in the streetscape.



ATM Structural Overhangs²

² Note use of monochromatic network logos on the surround of the machine on the right.

8. ADA Requirements

Banks installing ATMs are required to comply with accessibility guidelines under the American with Disabilities Act (ADA). The following are the current requirements taken directly from the ADA Guidelines. Figures illustrating these requirements are provided at the end of the paper.

Clear Floor or Ground Space for Wheelchairs

Size and Approach. The minimum clear floor or ground space required to accommodate a single, stationary wheelchair and occupant is 30 inches by 48 inches. The minimum clear floor or ground space for wheelchairs may be positioned for forward or parallel approach to an object. Clear floor or ground space for wheelchairs may be part of the knee space required under some objects.

Relationship of Maneuvering Clearance to Wheelchair Spaces. One full unobstructed side of the clear floor or ground space for a wheelchair shall adjoin or overlap an accessible route or adjoin another wheelchair clear floor space. If a clear floor space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearances shall be provided.

Forward Reach. If the clear floor space only allows forward approach to an object, the maximum high forward reach allowed shall be 48 inches. The minimum low forward reach is 15 inches (380 mm).

Side Reach. If the clear floor space allows parallel approach by a person in a wheelchair, the maximum high side reach allowed shall be 54 in (1370 mm) and the low side reach shall be no less than 9 in above the floor.

(a) *Reach Depth Not More Than 10 In (255 mm).* Where the reach depth to the operable parts of all controls as measured from the vertical plane perpendicular to the edge of the unobstructed clear floor space at the farthest protrusion of the automated teller machine or surround is not more than 10 in (255 mm), the maximum height above the finished floor or grade shall be 54 in (1370 mm).

(b) *Reach Depth More Than 10 In (255 mm).* Where the reach depth to the operable parts of any control as measured from the vertical plane perpendicular to the edge of the unobstructed clear floor space at the farthest protrusion of the automated teller machine or surround is more than 10 in (255 mm), the maximum height above the finished floor or grade shall be as follows:

Reach Depth		Maximum Height	
<i>inches</i>	<i>millimeters</i>	<i>inches</i>	<i>millimeters</i>
10	255	54	1370
11	280	53 1/2	1360
12	305	53	1345
13	330	52 1/2	1335
14	355	51 1/2	1310
15	380	51	1295
16	405	50 1/2	1285
17	430	50	1270
18	455	49 1/2	1255
19	485	49	1245
20	510	48 1/2	1230

21	535	47 1/2	1205
22	560	47	1195
23	585	46 1/2	1180
24	610	46	1170

Other issues related to ADA compliance include 1) accessibility for the blind and 2) proposed changes to the current guidelines for ATMs.

Accessibility for the blind: The ADA guidelines require that ATMs have equipment for people with vision impairments. For years, Braille has been used on ATM keypads and on auxiliary labels surrounding certain controls and slots. In the late 1990s, however, advocate groups for the blind began to work with certain banks and manufacturers on the development of speech-capable (talking) ATMs. Today, many banks are working toward installing such ATMs to displace Braille before changes to the guidelines clarifying that speech is required are passed into law. Bank of America has been the leader in this area, but several other large banks also are deploying speech-capable machines.

Proposed Changes to ADA Guidelines: A government-sponsored group, called the Access Board, is responsible for review of the current ADA guidelines and for proposing changes where appropriate or needed. This group is made up of both government employees and representatives from the public sector, including representatives of disabled groups. Their web site can be found at www.access-board.gov.

The Access Board published a proposed set of changes to the ADA laws in November of 1999. The changes affect every aspect of ADA, but for the purposes of this research paper we are concerned with only those rules that affect ATMs. The proposed changes were put out for public review and over 2,500 comments were received during the six-month input period. Final recommendations are pending. Once the Access Board adopts the final guidelines, which is expected to occur this summer, the Department of Justice must adopt them as part of its ADA regulation before they have force of law.

The proposed changes affect several aspects of ATMs, including access and reach, keypads, and output of information.

Access and Reach

It is expected that the height and reach requirements will be changed so that the maximum height will be 48 inches rather than the current 54 inches. The requirement for clear floor space will remain the same.

Keypads

Proposed changes include a telephone-style layout for number keys, specified heights of and minimum spacing between keys, and raised symbols on the function keys for the visually impaired.

Output of Information

The change that presents the greatest challenge for ATM manufacturers is the proposed requirement for speech capabilities. The proposed guidelines require audible instructions to be available, allowing a blind person to perform any transaction a sighted person would be able to perform using the ATM. Another proposed change to ATM output is the use of character displays designed for visually impaired persons who can distinguish large type styles.

One of the major industry concerns is whether the changes will be required for existing machines, requiring expensive upgrades. The new rules will certainly apply to machines installed after some as-yet-undetermined date, but the Department of Justice has yet to determine how they will affect the installed ATM base.

Industry Trends

After almost a generation of ATM use, many banks (especially savings and depository institutions) have recognized that ATM kiosks and through-the-units units have had an effect in disconnecting the consumer from the branch banking experience. Consumers still maintain a desire to conduct their banking within an environment that promotes human interaction.

To promote and market the banking experience and establish market share, many banks now prefer that the ATM machines be located within an enclosed vestibule. Not only does this trend ensure better safety, it also gives the bank greater ability to control the marketing environment to enhance consumer attraction and institution identification. Although the enclosed vestibule does not actually have staff banking personnel assigned it, it does provide a semi-traditional banking environment rather than a generic outdoor experience for the customer. Vestibule designs have tested well in consumer preference surveys.



Vestibule Design

In the future, vestibule designs will be the preferred installations for banking institutions located in urban areas with a definitive "street presence." Through-the-wall machines with significant surround environments will also continue to be used in urban contexts for reasons of marketability and brand identity. Surround environments provide banking institutions a visibility and presence to help offset the decline in interactions between customers and bank employees within the bank. The greater the size of the bank logo, the greater the bank identity and market presence. In some cases the ATM is the only exposure a customer has to a banking institution.

Banks are marketing more to younger generations and to attract this market segment they are relying on ATMs to provide introductions to the institution. To improve share of this

target demographic, some banks have programmed ATM monitors to display advertising attractive to a younger audience and also to provide concert tickets and music downloads. According to a recent American Banking Association (ABA) Survey of all consumers surveyed below age 53, 44% prefer ATMs to branch banking.

While vestibule and through-the-wall machines will continue to be used in urban contexts, the overall trend in the banking industry is "personal banking." Personal banking transactions will be facilitated through electronic media, including the Internet, cell phone technology, and ATMs that are not necessarily located in bank branches. One future form of ATM will be a freestanding public kiosk with cash dispensing capabilities that the user activates through the use of a handheld computer device or cell phone. Prototypes for this concept are currently being tested.



ATM Kiosk Activated by Cell Phone

Appendix
ATM Machines Commercially Available

NCR Personas 85

Personas 85
Full-function exterior



Hole-in-Wall Dimension

23.5" x 28.4"

Fascia Exterior Surface Area

27.8" x 32.6"

Contact:

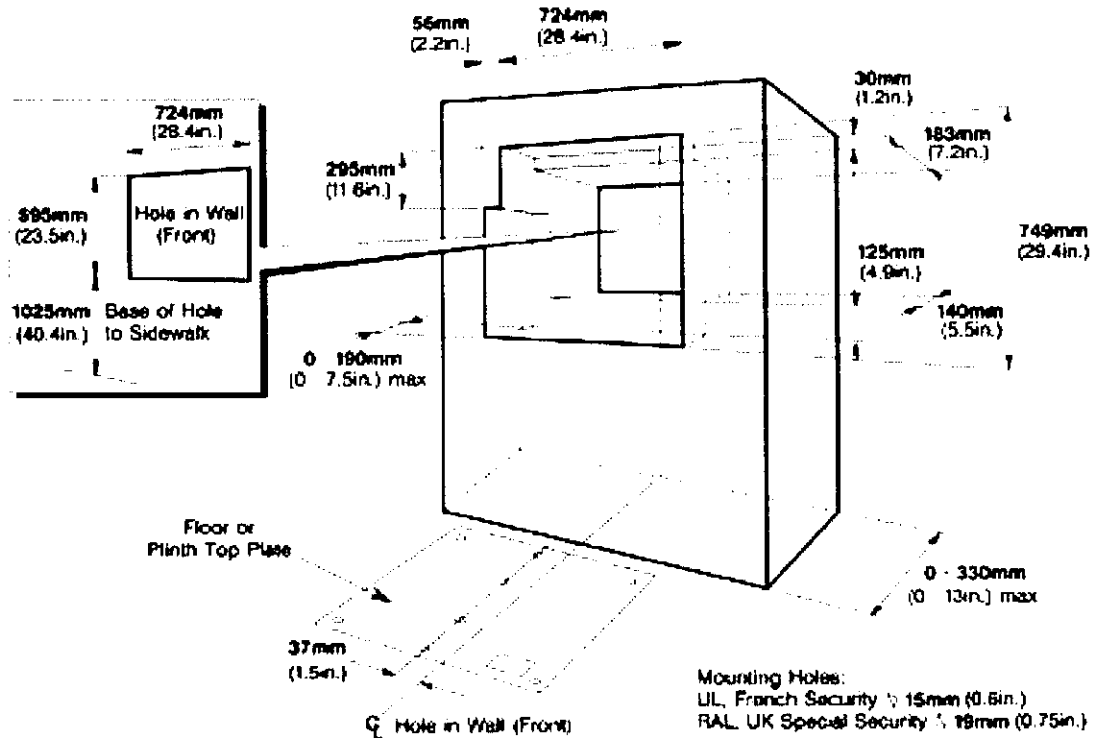
Rob Evans

NCR Sales Representative
(937) 445-4833

NCR Personas 85 Wall Dimension Plan View

Site Preparation
Physical Requirements

Figure D-2 ATM with 70" display
through thick wall (from 140mm
(5.5 in.) to 330mm (13 in.) thick)



See Notes on page 12 for details on height to base of hole
in wall.

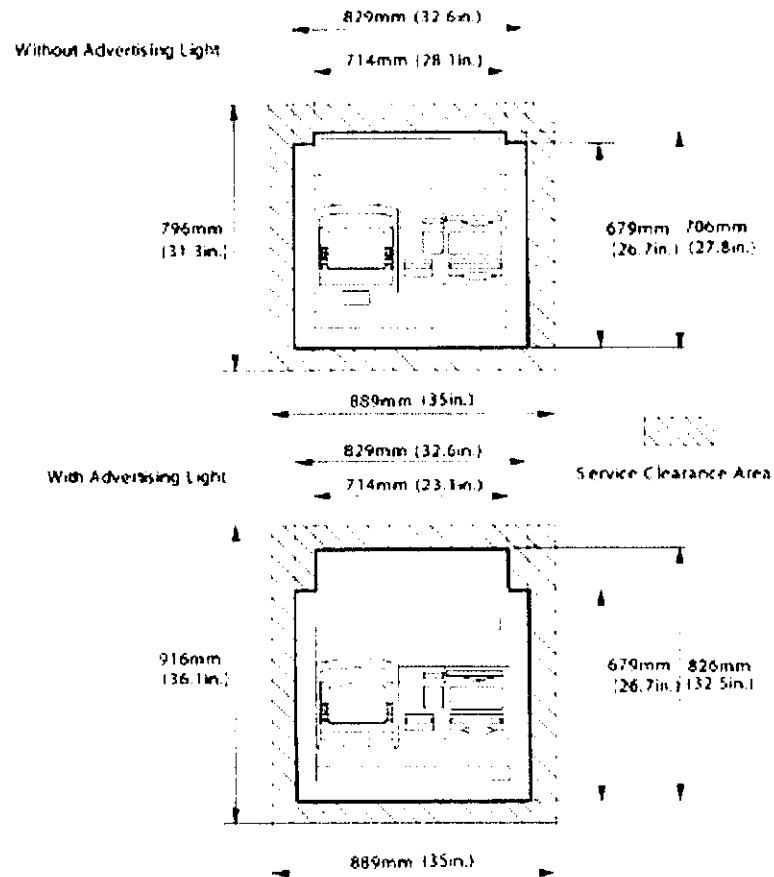
NCR Personas 85 Exterior Wall Installation

Site Preparation

Physical Requirements

Exterior Wall

The following illustration shows the minimum area required on the front of the wall for servicing a terminal.



Fujitsu 8040



Hole-in-Wall Dimension

24.3" x 29.5"

Fascia Exterior Surface Area

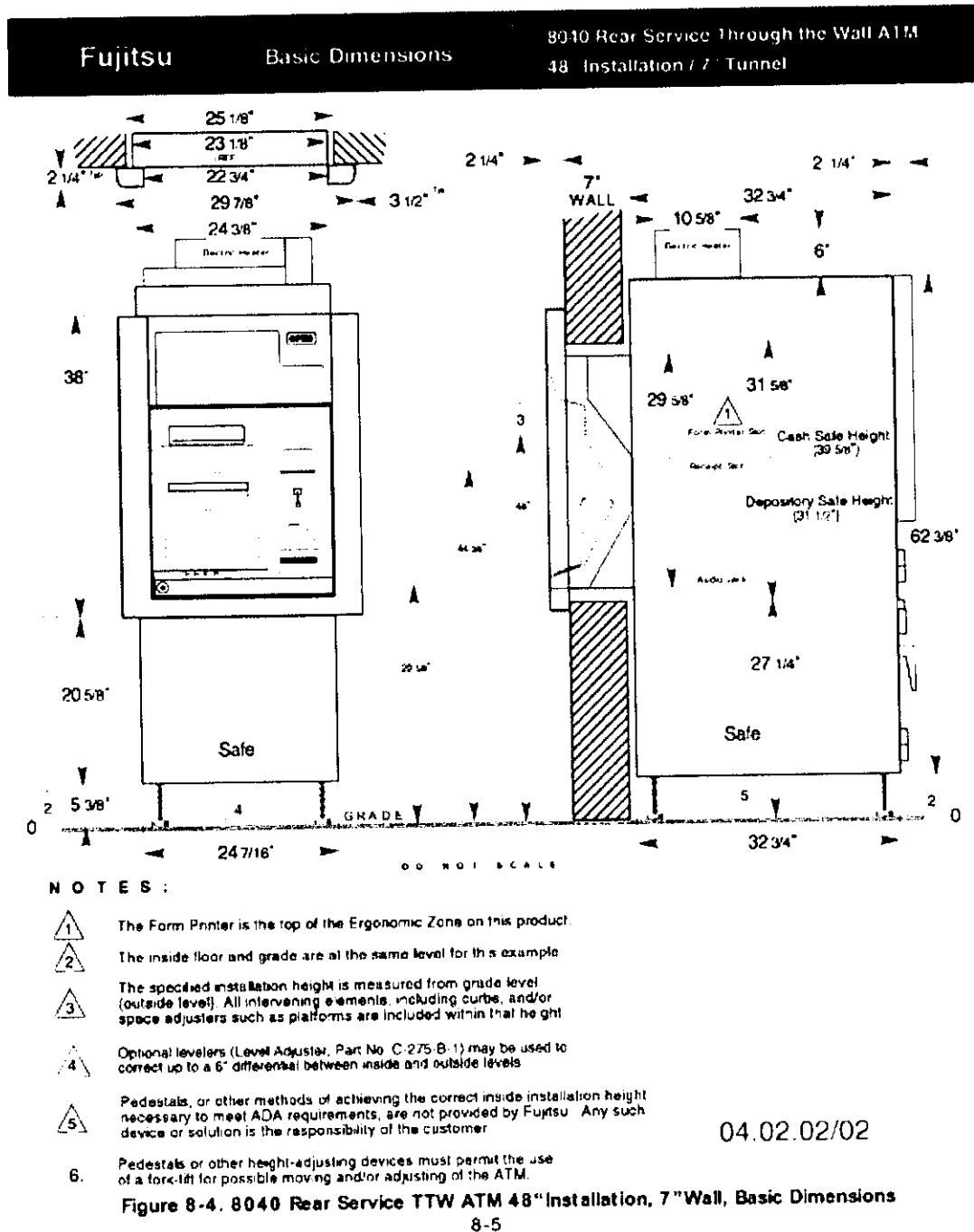
29.7" x 38"

Contact:

Jennifer Merz

Fujitsu Representative
(858) 458-5526

Fujitsu 8040 Installation Plan View



*** Diebold 1072ix Full Service ATM**



Hole-In-Wall Dimension

28.75" x 39.75"

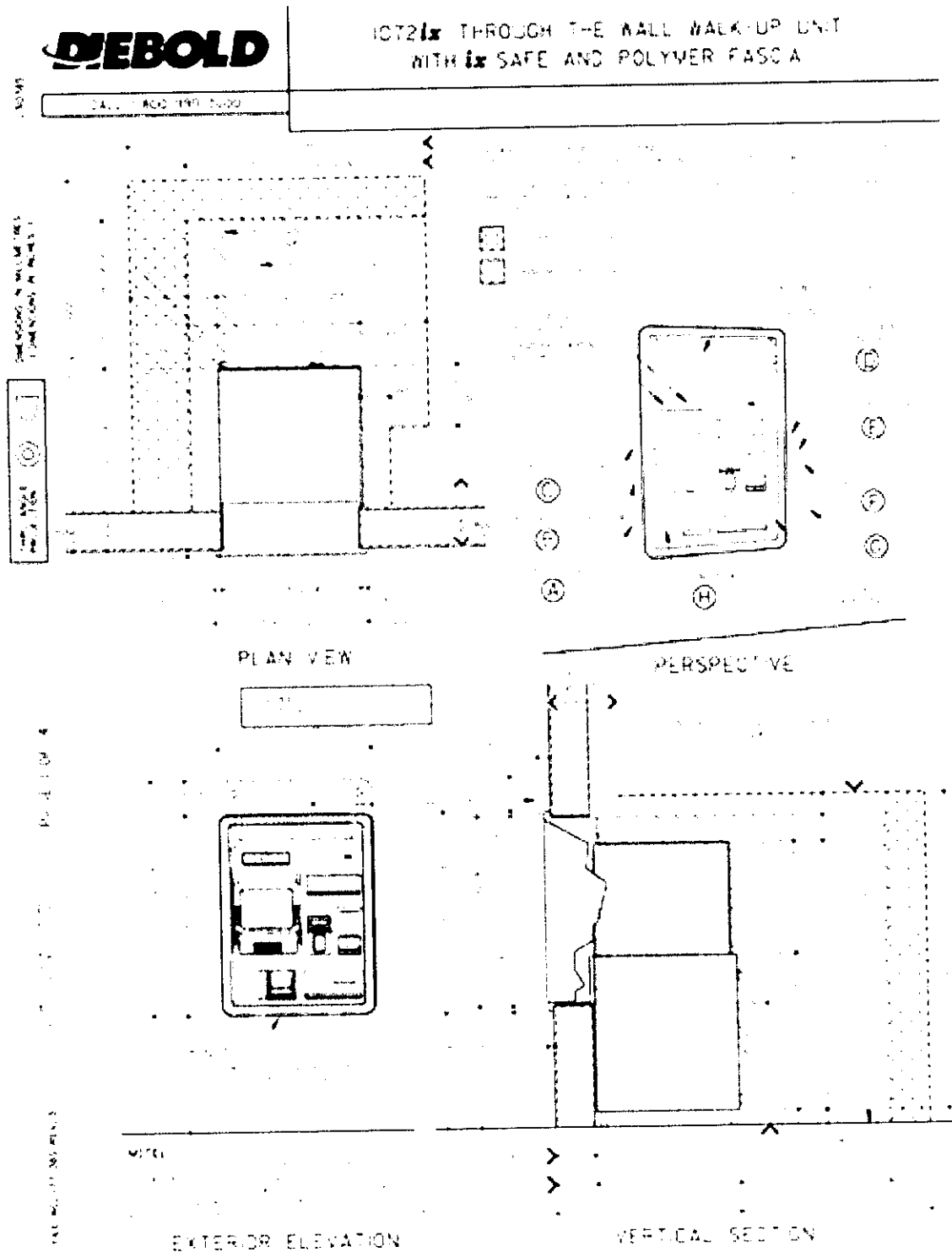
Fascia Exterior Surface Area

31.75" x 42"

Contact:

Michael Arnold Diebold Representative
(800) 806-6827

Diebold 1072ix Installation Plan View



***Diebold 1071ix (cash dispenser only)**



Hole-In-Wall Dimension 23.5" x 39.75"

Fascia Exterior Surface Area 25.875" x 42"

Contact: Michael Arnold Diebold Representative
(800) 806-6827

Diebold 1071ix Installation Plan View

DIEBOLD

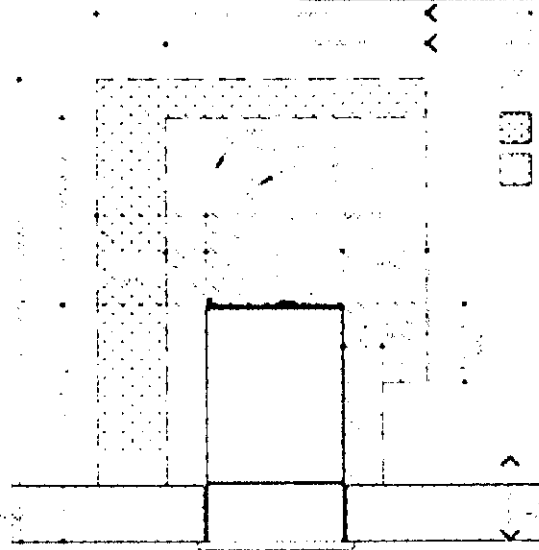
1071ix THROUGH THE WALL WALK-UP UNIT

03/19

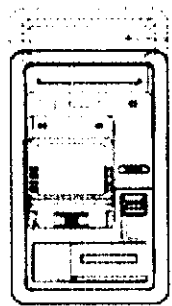
CALL 1-800-899-1600

DIMENSIONS IN MILLIMETERS
DIMENSIONS IN INCHES

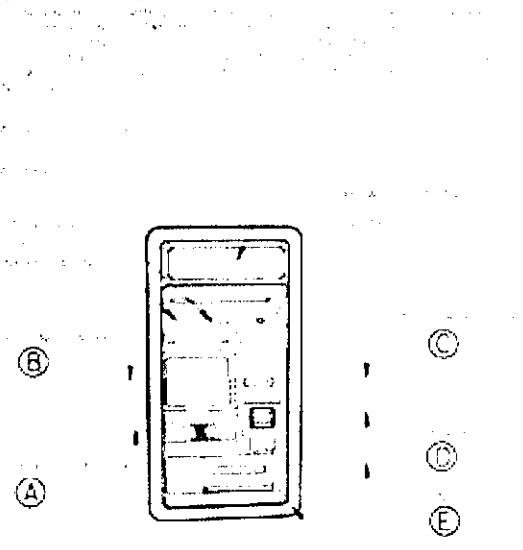
FACE AND
PERFORATION



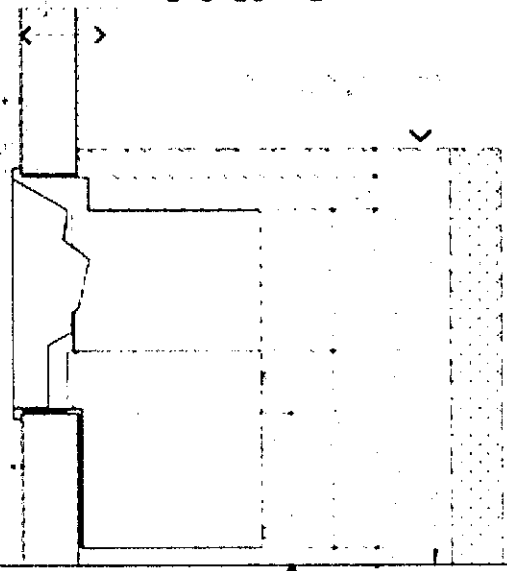
PLAN VIEW



EXTERIOR ELEVATION



PERSPECTIVE



VERTICAL SECTION

NOTES

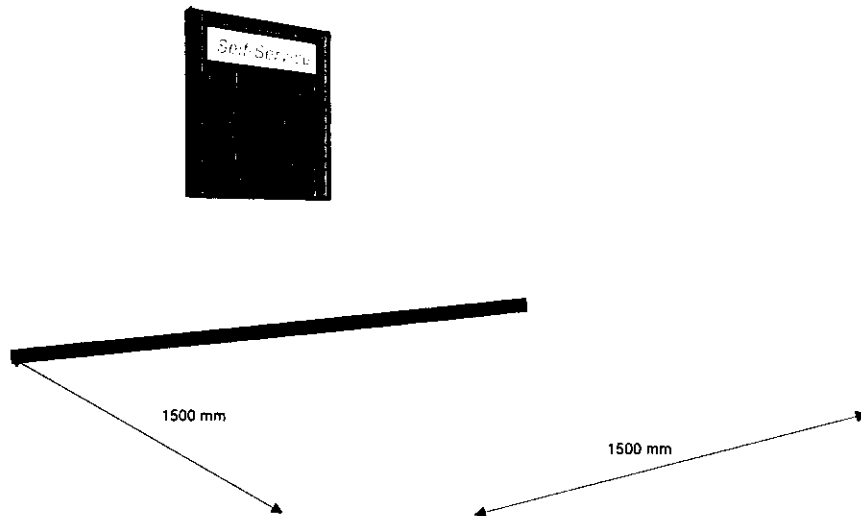
PAGE 1 OF 4

03/19

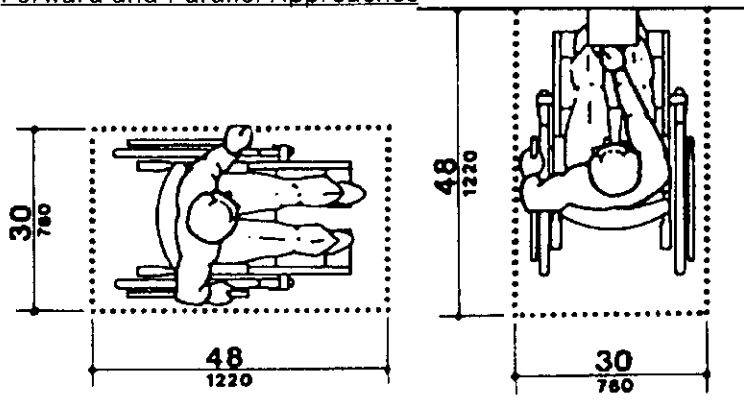
1411 NO. 171 581 REV. 3

ADA Requirement Figures

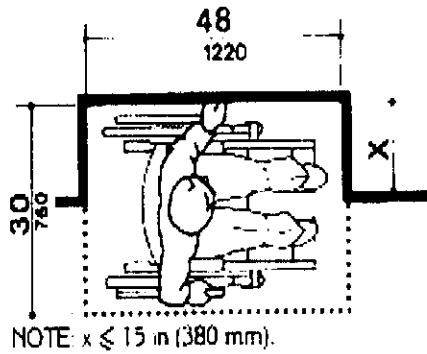
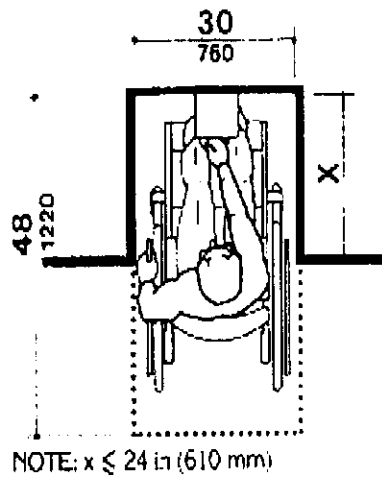
Clear Floor Space: (Recommended 25 sq. feet total)



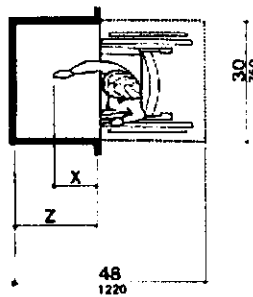
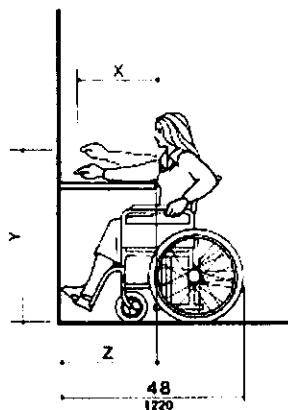
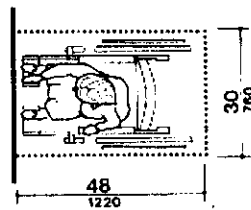
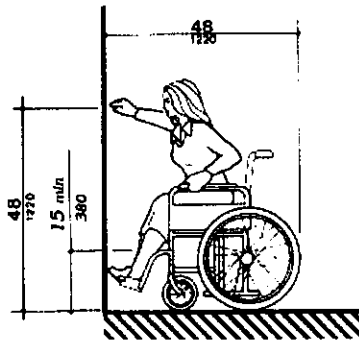
Forward and Parallel Approaches



Clear Floor Space (Accommodating Alcove Design)

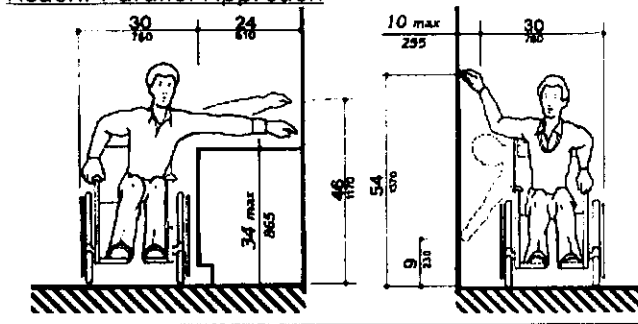


Reach: Forward Approach



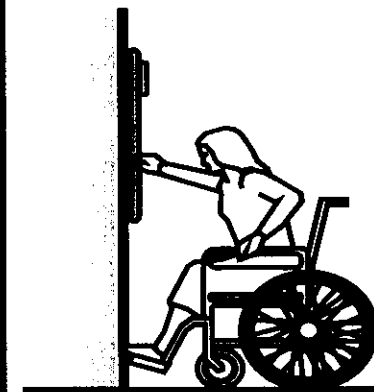
NOTE: x shall be ≤ 25 in (635 mm); z shall be $\geq x$. When $x < 20$ in (510 mm), then y shall be 48 in (1220 mm) maximum. When x is 20 to 25 in (510 to 635 mm), then y shall be 44 in (1120 mm) maximum.

Reach: Parallel Approach



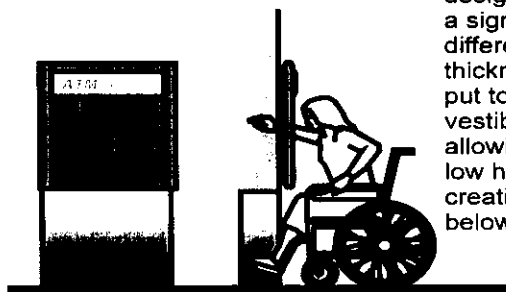
Tips for ATM Design to Accommodate Persons in Wheelchairs

Problem?



At some vestibule ATM locations there may be a requirement for greater access than that required by this guideline.

Tip



ATMs designed for through external wall installation are normally designed to accommodate a significant height differential and wall thickness. This can be put to advantage in a vestibule situation - allowing installation at a low height and the creation of a footrest well below the interface.

Additional Information

Persons Interviewed

Faye Dolnick, AICP, American Planning Association Planners Advisory Service

Lana Harmelink, International Director of Operations, ATM Industry Association

Bill Jackson, CTO Triton Corporation

Dave Johnson, Public Relations Representative, American Banking Association

Hansop Kwon, CEO Tranax Corporation

Chip Marshall, AIA Security Vault Works (Leading ATM industry installation contractor)

Stuart Mackinnell, Riggs Bank

Neil Schwartz, Vice President, NCR

Lyle Elias, ATM Industry Association

Kathy Cameron, Paragon Corporation (EFT and ATM Consulting Contractor)

References

Bill Jackson, ABA Banking Journal, "Americans with Disabilities Act and its Effect on ATMs," June 2002

Robert Feeney, Access to ATMs : UK Design Guidelines
http://www.cae.org.uk/cae_publications.access_atm.html (1999)

Mentis Corporation [1998] U.S. Banking Systems and Technology: ATMs and Self Service Technology

Retail Banking Research Ltd. [March 1998] The Global ATM Market to 2002

<http://www.rbrldn.demon.co.uk/cash.htm> The Future of Automated Teller Machines (ATMs)

ATM Installers

MF Blouin Corporation
Security Vault Works

ATM Networks

Maestro / Master Card
Cirrus

ATM Manufacturers

Diebold
NCR
Triton
Tranax

ATM Industry Facts

- Most full service ATM machines exteriors including fascias and surround should undergo an extensive exterior cleaning at least once annually to ensure protection against wear and tear.
- The busiest times for ATM usage are Friday and Saturday evenings and holidays
- The typical branch ATM garners about 4,000 to 6,000 transactions a month

Source: ABA ATM Fact Sheet 2001

Number of ATM Machines:

2000 - 273,000
 1999 - 227,000
 1998 - 187,000
 1997 - 165,000
 1996 - 139,134
 1995 - 122,706
 1994 - 112,755
 1993 - 94,822
 1992 - 87,330
 1991 - 83,000

Total U.S. ATM Transactions:

2000 - 13.2 billion
 1999 - 10.8 billion
 1998 - 11.2 billion
 1997 - 10.9 billion
 1996 - 10.7 billion
 1995 - 9.68 billion
 1994 - 8.45 billion
 1993 - 7.70 billion
 1992 - 7.20 billion
 1991 - 6.41 billion

Monthly Transactions per ATM in U.S.:

2000 - 4,029
 1999 - 3,985
 1998 - 4,973
 1997 - 5,545
 1996 - 6,399
 1995 - 6,580
 1994 - 6,367
 1993 - 6,772
 1992 - 6,876
 1991 - 6,403

Average Withdrawal: \$60

First U.S. ATM: 1971, Citizens & Southern National Bank, Atlanta

ATM Costs:

\$15,000 - \$50,000 per machine
 (depending on functions)

\$12,000 - \$15,000 annual
 maintenance costs (cash
 replenishment, servicing, telephone
 costs, rent, etc.)

Off-Branch ATM Deployment in U.S.:

2000 - 156,000
 1999 - 117,000
 1998 - 84,000
 1997 - 67,000
 1996 - 51,507
 1995 - 37,804
 1994 - 28,707

Off-Branch ATM Monthly Costs:

Depreciation	\$300
1st line maintenance	\$270
2nd line maintenance	\$150
Cost of funds	\$97
Telecommunications	\$123
ATM processing	\$100

ATM WORKGROUP

Larry Robinson
Planning Commission

Michael Wheeler
Board of Architectural Review - OHAD

Chet Avery
Commission on Persons with Disabilities

Jennifer Harper
Alexandria Chamber of Commerce

David Olinger
Old Town Civic Association

Peter Spencer
Upper King Street Civic Association

Julie Crenshaw

Randy Benarick
Director of Security
Burke & Herbert Bank

Consultants: Wallace Roberts & Todd, LLC
David C. Rouse
Graciela P. Cavicchia

Staff: Barbara Ross, Planning and Zoning
Steve Rosenberg, Assistant City Attorney



Memorandum

Text Amendment #2002-0004
ATMs Attachment 3

To: Barbara Ross
Deputy Director
City of Alexandria, VA Department
of Planning & Zoning

Date: August 21, 2002
From: Wallace Roberts & Todd, LLC
Ref. No. 02-3143-01
Project: Alexandria ATM Study
Pages: 8
Re: Revised Alternatives

This memorandum presents alternatives for regulating Automated Teller Machines (ATMs) in the City's historic districts. Originally developed for the purposes of discussion at a July 10 meeting held in Alexandria, the memorandum was revised after the meeting to reflect additional research. These alternatives were developed based upon 1) research into ATM products and associated issues (presented in a separate paper) and 2) review of Alexandria's existing ATM regulations (Section 7-1800). We recommend an approach that organizes the ATM regulations into three broad categories:

- ATM Location
- ATM Components
- Other Design Elements

ATM Location

Alexandria's existing ATM regulations have a number of provisions addressing location:

- No machine may be installed on the exterior of a contributing structure to the district.
- No more than one machine may be installed per individual building.
- No freestanding machine may be installed outside of a completely enclosed space within the interior of a building, unless located within an open court or similar area within the footprint of a noncontributing building.
- No machine shall face residentially zoned land.
- The building on or within the footprint of which the machine is located shall be located in a commercial zone.

We see no compelling reason to significantly change these existing regulations unless the City wishes to ban outside installations within historic districts entirely, which would make additional regulations a moot point.¹ The contributing structure

¹ Such a regulation would not be inconsistent with industry trends that are moving in the direction of interior installations (see research paper). Nevertheless, we do not recommend an outright ban on exterior (through-the-wall) installations. The regulations could, however, state up front that interior installations are preferred and that exterior installations are allowed only in accordance with certain requirements.

C:\My Documents\ATM Alternatives Memo_revised.doc

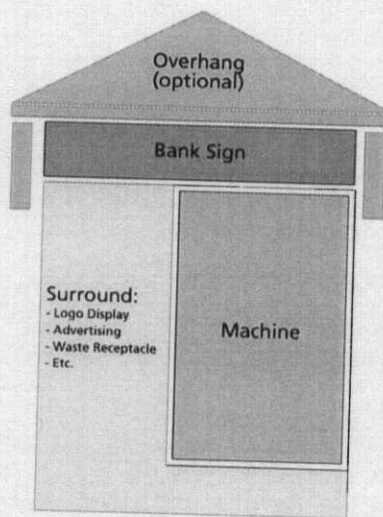
WR

requirement is particularly important to preserve the integrity of historic buildings. One additional requirement that could be considered is location of ATMs in recessed alcoves or on walls that do not face the street. ATMs facing the street would be allowed only if no practical alternative exists.

ATM Components

The major components of ATM installations are the machine itself, the surround, the bank sign, and (in certain situations) overhangs for weather protection. Of these elements, Alexandria's current regulations address machine size and signage:

- No machine shall exceed a maximum size of 37 inches in height and 23 inches in width, or the minimum size commercially available, whichever is smaller.
- Signage shall be as small as possible, and no greater than a total area of 6.5 square feet. Backlit signs shall not be permitted.



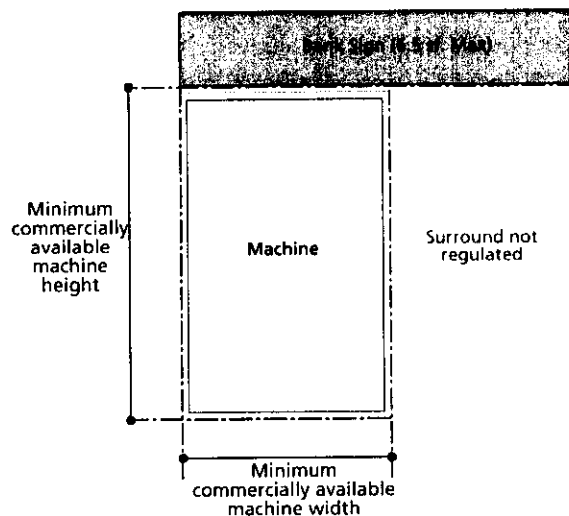
ATM Components



Examples of ATM Components

We have the following comments on Alexandria's existing regulations for ATM components:

- The machine size requirement is problematic in that our research revealed that the minimum size, full service² ATMs commercially available measure 22" in width x 40" in height. The more common size is 31" x 48".
- The regulations do not address the ATM surround, which can produce the greatest visual impact of an ATM installation.
- The signage requirement does not address the relationship to the machine and surround size, which is the major factor driving the sign size. The City's requirement would prohibit the largest existing historic district ATM signs (which typically measure 19" x 65" or 8.5 square feet) while permitting others installed over 31" x 48" machines/surrounds (typically 14" x 56" or 5.4 square feet).



ATM Components Currently Regulated

² Full service ATMs (as opposed to machines that only dispense cash) are required in bank branch installations.



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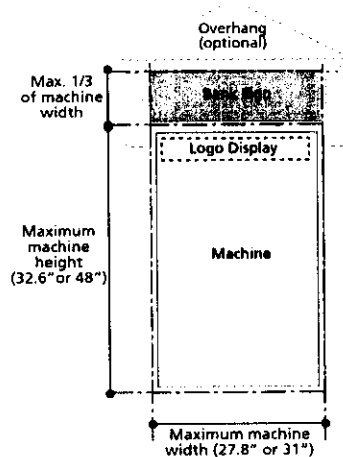
We suggest the following alternatives for consideration in regulating ATM components:

Alternative #1: Regulate components based upon the maximum machine size permitted. Permit a bank identification sign and logo network display tied to the machine size, but no other surrounding elements.

Sub-alternative 1-a: Machine may be no greater than 27.8" x 32.6" in size. This is the smallest full-service machine commercially available and the dimension includes the fascia exterior surface area.

Sub-alternative 1-b: Machine may be no greater than 31" x 48" in size. This is the size of most machines in Old Town.

As a general rule, the visual impacts of ATM installations derive from the combined effect of the machine, surrounds, and signage; the smaller these elements, the less the impact. By limiting machine size, tying signage to machine size, and eliminating the surround, this alternative would reduce the visual impacts of ATM installations. One issue for banks would be the elimination of the surround, which is considered important for display purposes and can also contain features such as an envelope holder and waste receptacle. However, examples exist of ATMs installed without surrounds.



Maximum Machine Size

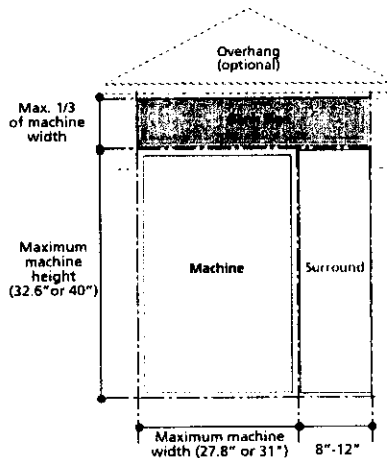


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Alternative #2: Regulate machine and signage size as in Alternative #1, but permit a surround limited in size and on one side of the machine only.

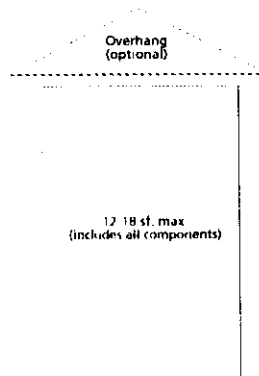
This alternative would permit larger ATM installations than Alternative 1, but the visual impact would be addressed by limiting the size of the surround. The surround could be used for network logos and other features. The same two sub-alternatives with respect to machine size would apply.



Maximum Machine Size with Surround

Alternative #3: Set a maximum size for the entire ATM installation, including machine, bank sign, and surround. Allow different sizes for the various components as long as they fit within the overall dimension.

This alternative would provide banks with the flexibility to install individual ATM components that meet their specific requirements. However, it would provide the City with less control over the design of these components (for example, an overly large sign could theoretically be installed in combination with a small machine).



Maximum Area



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Alternative #4: Sets dimension requirements based on the placement of the ATM machine within the building footprint.

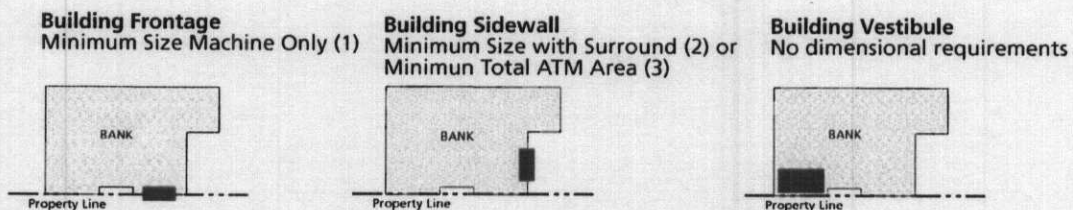
This alternative provides banks with the flexibility to install individual ATM components that meet their preferred or specific requirements.

The requirements for ATM placement are specified below:

Building Frontage- Minimum Machine Size Only (Alternative #1)

Building Sidewall- Minimum Size with Surround or Minimum Total ATM Area (Alternatives #2 or #3) (Minimum size could be larger than allowed facing the street.)

Building Vestibule- No Dimensional Requirements



Examples applying alternatives to existing ATMs in Alexandria



Existing ATM



Effect of Proposed Regulation (Alternative 1)



Existing ATM



Effect of Proposed Regulation (Alternative 2)

Other Issues: Several other issues related to ATM components could be addressed as follows:

- **Signage design:** The City could go beyond sign size to address color and type specifications. However, our opinion is that for the purposes of ATM regulations it is sufficient to address sign size; any additional issues would presumably be addressed in the signage requirements for historic districts. The prohibition on backlit signs should be continued.
- **Network logo displays:** These displays can have disproportionate visual impacts due to the bright colors of the individual logos. The following requirements could be established to address this issue:
 - Logos shall be the minimum size permitted by network companies.
 - A monochromatic color scheme shall be used.
- **Advertising:** Advertising displays on the surrounds can also have a significant visual impact. Such advertising could be prohibited with the exception of network logo displays.
- **Overhangs:** If present, these elements should be regulated in accordance with historic district architectural guidelines.

Other Design Elements

Other design elements include lighting, ADA accessibility, and waste receptacles.

Lighting

ATM lighting is considered important for reasons of security but can have a significant impact on the surrounding historic district environment during nighttime hours. Alexandria's current lighting regulation specifies that ATM lighting may not exceed 2-foot candles measured at a radius of five feet from the source.³ This regulation is stricter than the de facto industry standard, which as promulgated by the State of Maryland calls for 10 foot candles within a 10' radius and 2 foot candles within a 50' radius. Alternatives to address this issue include:

³ One foot candle is equivalent to the amount of light produced by one standard candle on a square foot surface at a distance of one foot.



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1. *Maintain the current regulation.* Because there are no requirements for ATM lighting in Virginia, Alexandria can set its own requirements without conflicting with the state. However, it should be noted that the current regulation does not provide the minimum light required for some security camera systems. (Black and white surveillance video requires .02 foot-candles, color surveillance video 2.5 foot candles, and PC based video systems 5.0 foot candles.)
2. *Increase permitted lighting to the Maryland standard.* Although this would address security and liability issues that could potentially be raised by banks with respect to the current requirement, it would represent a substantial increase over the current regulation.
3. *Increase permitted lighting to be adequate for PC based video systems.* This change would entail increasing the light level from 2 to 5 foot candles measured at a radius five feet from the source. It would represent a significant increase in permitted lighting over the current regulation, but would be less extreme than going to the Maryland standard.

ADA Accessibility

ATMs have for many years been required to meet accessibility standards set by the Americans with Disabilities Act (ADA). As described in our research paper, changes to these standards are currently pending. To address this issue, a requirement could be added to the regulations calling for ATMs to comply with applicable requirements of the Americans with Disabilities Act, as amended.

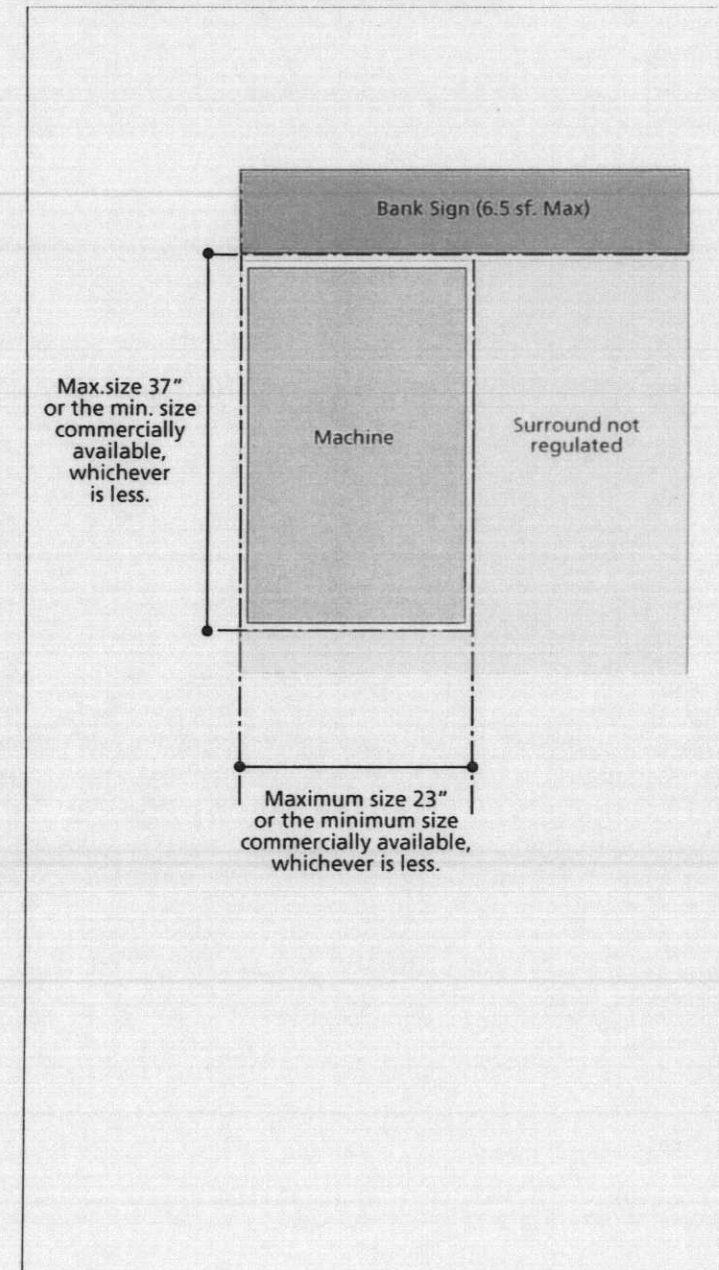
Waste Receptacles

ATMs can be installed with waste receptacles built into their surrounds. However, many banks use a waste container at or near the ATM and separate from the surround (or if a surround is absent, as per ATM Components Alternative #1). We suggest that waste containers be permitted, provided that they are visually compatible with the surrounding streetscape with respect to color, material, size, etc.

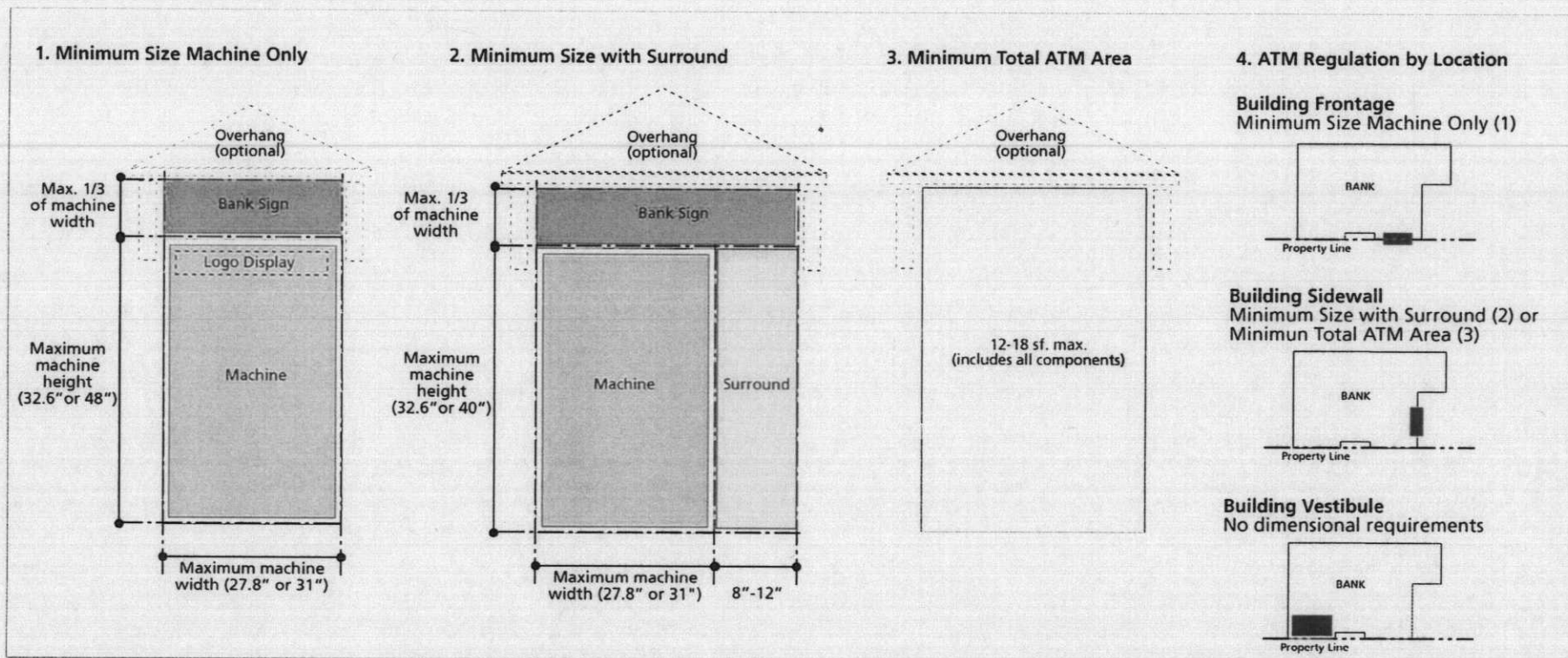
1. ATM COMPONENTS



2. CURRENT ATM REGULATION



3. ATM COMPONENT ALTERNATIVES



4. APPLICATION OF ATM COMPONENT ALTERNATIVES



Alternative 1



Alternative 2





Memorandum

To: Barbara Ross
Deputy Director
City of Alexandria, VA Department
of Planning & Zoning

Date: July 12, 2002
From: Wallace Roberts & Todd, LLC
Ref. No. 02-3143-01
Project: Alexandria ATM Study
Pages: 3
Re: 7/10/02 ATM Task Force
meeting

This memorandum summarizes the results of the meeting of the "ATM Task Force" held on July 10, 2002. Persons attending the meeting included:

- Randy Benarick, Director of Security, Burke and Herbert Bank
- Graciela Cavicchia, WRT
- Julie Crenshaw
- Jennifer Harper, Alexandria Chamber of Commerce
- David Olinger, Old Town Civic
- Larry Robinson, Planning Commission
- Steve Rosenberg, Assistant City Attorney
- Barbara Ross, Planning & Zoning
- David Rouse, WRT
- Michael Wheeler, Board of Architectural Review – OAHD

The purpose of the meeting was to:

1. Review the results of WRT's research on Automated Teller Machine (ATM) industry products/trends and associated issues related to developing amendments to Alexandria's existing regulations for exterior ATM installations in historic districts.
2. Consider alternatives developed by WRT for changing the regulations, with the objective of reaching consensus on a preferred alternative to be developed into a text amendment for review by the Planning Commission and City Council.

The meeting was very productive, as consensus was reached regarding how the revised regulations should address ATM location, ATM components, other design elements, and the approval process.

ATM Location

It was agreed that the existing regulations are strongest in how they address the permitted locations of ATM machines. Thus it was the consensus of the group that these regulations should be retained:

- No machine may be installed on the exterior of a contributing structure to the district.
- No more than one machine may be installed per individual building.



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- No freestanding machine may be installed outside of a completely enclosed space within the interior of a building, unless located within an open court or similar area within the footprint of a noncontributing building.
- No machine shall face residentially zoned land.
- The building on or within the footprint of which the machine is located shall be located in a commercial zone.

An additional requirement was suggested to state that location of ATMS in recessed alcoves or on walls perpendicular to the street is preferred.

ATM Components

The basic ATM components include the machine, the area around the machine (referred to as the surround), and the bank sign. The surround is not a necessary part of the installation but is generally used by banks for purposes such as display of network logos and advertising. Alexandria's current regulations address the size of the machine and the total area of signage but not the surround, which often produces the greatest visual impact. These regulations state:

- No machine shall exceed a maximum size of 37 inches in height and 23 inches in width, or the minimum size commercially available, whichever is smaller.
- Signage shall be as small as possible, and no greater than a total area of 6.5 square feet. Backlit signs shall not be permitted.

With regard to machine size, the majority of full-service ATMs installed in Alexandria measure approximately 31" x 48" but smaller size models are available. The consensus of the group was to limit the machine size similar to the existing regulations by setting a maximum size that would prohibit the larger machines and their associated visual impacts, while allowing some flexibility to accommodate commercially available machines. The group also indicated that the regulations should not permit surrounds. A bank identification sign above the machine would be permitted, along with network logos displayed on the machine or identification sign.

Following the meeting, WRT did some additional research on machine sizes to address issues raised by the group. This research revealed that machine sizes frequently change as manufacturers discontinue existing models and introduce new ones. In addition, machine size is not the best measure for regulatory purposes, as an exterior strip is typically installed around the perimeter of the machine to provide weather protection and service access. As an example, the NCR Personas 85, a model that is being discontinued, requires a hole in the wall for the machine that is 23.5" x 28.4" in size but an overall exterior surface area of 31.3" x 32.6", including the minimum area required on the front of the wall for servicing. To account for these issues while addressing the intent of the group to limit impacts on aesthetic values in the historic districts, we recommend that the City move away from tying machine size to specific dimensions and instead set a maximum overall area of the exterior surface of the machine.

A maximum exterior surface area of 8.0 square feet would meet the intent of the group to limit installations to smaller ATMs, allow for installation of the required exterior fascia, and provide flexibility to accommodate changing model sizes. Two of the three ATM manufacturers – NCR and Fujitsu – manufacture full-service models that will fit



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within this guideline. However, the smallest size full-service model offered by Diebold, the largest manufacturer, measures 31.75" x 49.25" (11.2 square feet), or 31.75" x 42" (9.26 square feet) without an optional light. (Diebold offers through-the-wall cash dispensers that are similar in size to the full-size models of the other manufacturers.)

Based upon the above, the following revised regulations for ATM components would meet the intent of the group:

- The exterior surface of the machine shall be a maximum of 8.0 square feet in size. (The City may, however, wish to reconsider this figure given the larger sizes of the Diebold machines.)
- One bank identification sign shall be allowed abutting the top of the machine. The width of the sign shall not exceed the width of the machine and the height of the sign shall not exceed one-third of the width of the machine. Backlit signs shall not be permitted.
- No surround shall be permitted. Network logos may be displayed provided they are contained within the borders of the machine or the bank identification sign and a monochromatic (gray scale) color scheme is used.

Other Design Considerations

Other design considerations include lighting and accessibility for persons with disabilities. Alexandria's current regulations specify that ATM lighting may not exceed two foot candles measured at a radius five feet from the source. The regulations do not currently address accessibility.

With respect to lighting, it was the consensus of the group that the current regulation should be maintained. Existing ATM machines seem to be operating satisfactorily within the two foot candle limit because of ambient lighting from streetlights.

With respect to accessibility, ATM installations have been required to comply with design standards set by the Americans with Disabilities Act (ADA) for a number of years. For this reason, the consensus of the group was that it is not necessary to add accessibility requirements to Alexandria's regulations. Barbara Ross will consult further with Chet Avery from the commission on Persons with Disabilities, who was unable to attend the meeting due to a scheduling conflict.

Approval Process

It was the consensus of the group to maintain the current process of administrative approval of ATM installations rather than requiring a special use permit.

ABA Banking Journal

Saturday, June 01, 2002

The Americans with Disabilities Act and Its Effect on Automated Teller Machines

By Bill Jackson, CHIEF TECHNICAL OFFICER, TRITON

INTRODUCTION

The Americans with Disabilities Act (ADA) was first enacted in the United States in 1990. It covers a wide range of issues relating to the accessibility of goods and services by those with some type of disability. The US Government classifies approximately 43 million Americans with some type of disability. The most common disabilities are blindness (between 10 and 11 million Americans are legally blind, defined as: corrected vision of no greater than 20/200), and paralysis or other conditions that require the use of a wheelchair to get around.

Automated Teller Machines were one of the first "products" singled out for specific regulation by the ADA guidelines. The regulations for ATMs became law in 1992 and have not changed much in 10 years. Today, technology has advanced well beyond what was available in 1992, so changes to the current rules are in the works.

The Current State of the Regulations While the original text of the ADA guidelines would fill a good-sized binder, the parts specific to ATMs are focused and quite short. Unfortunately, one paragraph has sparked heated debate and subsequent lawsuits over its interpretation.

This paper will discuss the state of the current guidelines in some detail. The entire text of the ATM section of the ADA is included in Appendix A for reference.

There are two general areas of concern for ATM design. First, accessibility refers to the physical placement of the equipment and the ability of a disabled person to actually get to it to use it. The second concern is usability by visually impaired persons.

Section 4.34.1 General Accessibility

The installation of the ATM is generally controlled by the independent sales organization (ISO). Manufacturers have no responsibility for the final placement, but can ensure that their customers have the information necessary to comply with the installation guidelines. This section simply says that doorways and aisles must be a certain width to allow persons in wheelchairs to navigate up to the ATM.

Section 4.34.2 Approaching the ATM, Clear Floor Space

Once a wheelchair user gets to the ATM, there must be enough room to position the chair in a manner that will allow access to all necessary controls. The minimum amount of floor space needed is shown in the figure here.

Section 4.34.3 Reach Ranges

This section deals with the ability of a wheelchair user to reach the controls of the ATM, without having to reach beyond a comfortable or safe limit. The ATM owner can choose to comply with either the forward reach requirements or the side reach requirements. As shown in the drawing to the right, if approached from the forward position, the controls and delivery slots must generally be between 15" and 48" from the floor surface.

When approached from the side (the most common approach) the reach ranges are somewhat wider. This is because the user does not have to reach out over the front and possibly fall out of the chair. The range here is between 9" and 54".

Section 4.34.4 Controls

This section ensures that all user controls, buttons, doors, etc. can be operated with less than five pounds of force.

Section 4.34.5 Equipment for Persons with Vision Impairments

This section has sparked most of the debate among ATM owners, manufacturers, and advocates for the visually impaired. In the early days of the ADA, ATM manufacturers and advocate groups for the blind agreed that Braille was the best method for instructing visually impaired people on how to use the ATM. For many years, Braille was used on ATM keypads and on auxiliary labels surrounding certain controls and slots.

In the late 1990s, advocate groups for the blind began to work with certain banks and manufacturers to try to develop talking ATMs. The first talking ATM in the US was installed by a credit union in San Francisco City Hall in 1999. Many lawsuits have been filed based on the interpretation that section 4.34.5 required speech output from ATMs. While this has not actually been argued in court, since all cases have been settled, many banks are working toward installing talking ATMs before the changes that would clarify that speech is required are passed into law. Bank of America has been the leader in installed machines capable of speech, but several other large banks also are deploying speech-capable machines.

The Proposed Changes to the Current ADA Laws

A government-sponsored group, called the Access Board, is responsible for review of the current ADA guidelines and proposing changes where appropriate or needed. This group is made up of both government employees and representatives from the public sector, including representatives of disabled groups. Their web site can be found at www.access-board.gov.

The Access Board published a proposed set of changes to the ADA laws in November of 1999. The changes affected every aspect of ADA, not just ATMs, but for the purposes of this white paper, we are concerned with only those rules that affect ATMs. The proposed changes were put out for public comment, and over 2,500 comments were received during the six-month public input period. Final recommendations are pending. Once the Access Board adopts the final guidelines, which is expected to occur this summer, the Department of Justice must adopt them as part of its ADA regulation before they have force of law.

The proposed changes affect several areas: Access and Reach

It is expected that the height and reach requirements will be changed so that the maximum height will be 48 inches rather than the current 54 inches. The requirement for clear floor space remains the same.

Keypads

The most noteworthy proposal for keypads is the recommendation to use a telephone-style layout for the number keys. A single raised dot on the 5 key would serve as a reference point. The proposed guidelines may recommend minimum spacing between keys, certain heights to the keys themselves and raised symbols on the function keys to allow blind and visually impaired people to feel the different keys. There will probably not be any recommendation for keys to be certain colors, as long as the keys, the text on them, and the background around the keys contrast with each other.

Output of Information

The change that has presented the greatest challenge for ATM manufacturers is the proposed requirement for speech capabilities. This section presents the greatest challenge for the ATM manufacturers as they bring their equipment into compliance. It is also the only area where technology really has had an impact.

The proposed guidelines require audible instructions to be available, allowing a blind person to perform any transaction a sighted person would be able to perform using the ATM. Blind and visually impaired users can be accommodated in a different fashion, but access must be equal.

This particular provision has caused many manufacturers a great deal of trouble, due to the flexibility required to be able to support it in its entirety. In addition to "speaking" the menu, the terminal must also be able to speak the following:

- * What the user has selected before the transaction is executed.
- * All transaction information on the receipt, including the ATM user's balance.
- * Instructions for use of the audio guidance portion of the terminal.

Under the proposal, confirmation of the transaction before it is executed is simple and basic, and must allow the person to change or cancel the transaction if a mistake has been made on input. Reading the receipt allows a user to confirm that the transaction worked. Additionally, transaction information on the receipt would have to be presented orally. This would include the Reg. E information: amount, date, type of transfer, account identification, terminal location as well as balance information. However, it is expected that the final guidelines will not require, for example, the account number, the date and terminal location.

Help must be provided for users who are not yet familiar with the operation of the terminal. This should include description of the location of the important user interface points (keypad description, card reader, printer, etc.), description of the function keys and the symbols on them, and how to perform simple tasks.

Changes to ATM output are not limited to assisting the blind users. The Proposed guidelines also require simple sans serif characters (this typestyle is sans serif; this is not) of a certain minimum height that contrast with the background. This is to aid people who see poorly but can make out large type styles. People who are not visually impaired but cannot read the supported language can use the audio output. This group can include dyslexic, illiterate, barely literate and visitors or immigrants who may speak English but do not read the language.

One saving grace in the proposed guidelines is that in locations with multiple ATMs, only one must provide speech capabilities. However, there is no definition of "location." For example, a bank may have several ATMs in a lobby area, and under the new guidelines only one would have to be able to talk. This is fairly clear. On the other hand, consider an indoor shopping mall, where there may be several ATMs throughout the general area, as well as some in the larger retail locations. The machines may be owned by different entities as well. In this example, it is not clear if the "one talking ATM" per location applies, and if it does, who is selected to bear the burden of providing the talking machines.

The Players

There are several organizations that are involved in the process of changing the ADA guidelines. Each group is listed here along with a brief description of who makes up the group and what their relationship is to the process.

The Access Board

The Access Board is a group of about 30 people, half of them government representatives from most of the federal departments, and the other half, members of the public. The public members are appointed by the President and serve four-year terms. The board came into existence in 1973.

It's chartered with:

- * Developing and maintaining accessibility requirements for the built environment, transit vehicles, telecommunications equipment, and for electronic and information technology.

- * Providing technical assistance and training on these guidelines and standards.
- * Enforcing accessibility standards for federally funded facilities.

The Access Board is currently reviewing public comments to its proposed changes to the guidelines. It is expected to finalize changes late this summer.

The Department of Justice (DOJ)

The DOJ is the government agency that is responsible for adopting the ADA regulations (which include the Access Board's guidelines) and for implementing and enforcing the ADA. The DOJ will not act on the proposed changes to the regulation until the Access Board finalizes changes to the guidelines.

The Blind Industry Groups

There are three major blind advocacy organizations that have been involved in the process of commenting on and shaping the proposed changes. They include:

- * The National Federation of the Blind.
- * The American Council for the Blind.
- * The American Federation of the Blind.

Each of these groups has its own set of ideas on the proposed changes, which are sometimes not in complete alignment. In general, though, they each advocate greater accessibility to ATMs for the blind. These groups generally employ legal counsel to represent their interests and goals.

The Industry Group

An informal group organized by the American Bankers Association representing the ATM industry has formed to provide representation to the Access Board for the ATM industry. The Industry Group's mission is to ensure that whatever guidelines are adopted by the government are not only reasonable, practical and fair, but also useful to disabled people. This group is made up of the following types of organizations:

- * ATM manufacturers (all inclusive)
- * NCR
- * Diebold
- * Fujitsu
- * Triton
- * Banks (not all inclusive)
- * Bank of America
- * Bank One
- * PNC
- * Fleet Bank
- * Several other large and a few small banks

- * Independent service organization's (all inclusive)
- * E*Trade
- * Processors (all inclusive)
- * Concord EFS
- * Software vendors (all inclusive)
- * ACI
- * Industry trade group
- * American Banker's Association (ABA)

Each of the group members represents their particular area of interest.

The ABA, with the able guidance of Nessa Feddis, has been responsible for putting the Industry Group together and coordinating meetings with blind advocacy groups, educational organizations involved in accessibility and even the DOJ.

The Industry Group chair is Bill Raymond, Senior Vice President for Bank of America.

While some of the members of this group are competitors, they have managed to work together for the good of the industry. All members do not see eye-to-eye on all issues but agree that without input from the industry, the new guidelines could be quite onerous and expensive.

The Timeline for the New Guidelines

This section is a forecast of what is generally agreed to be the timeline for implementation of the new ADA changes. These are estimates.

Step 1: The Access Board will privately approve and submit its final guidelines sometime in April of 2002, although the final proposal may not be publicly available until midsummer. Some minor changes in the current proposal are expected.

Step 2: The Office of Management and Budget (OMB) will review the proposal to ensure it does not place an undue financial burden on any organization as a whole. Generally, the review does not take into account the burden, real or not, on individuals. The OMB should receive the Access Board proposal in March of 2002. The OMB has 60 (or possibly 90) days to review it.

Step 3: The Department of Justice should receive the proposed guidelines with OMB comments in mid-2002. The DOJ can accept the Board's recommendations or modify them, but it is unlikely that it would modify them as it is on the Access Board. The DOJ will then put out for public comment its proposed changes to the regulation, along with the guidelines adopted by the Access Board, and will probably allow 60 to 90 days for comment. Once the review is completed, the DOJ will finalize the regulation. The DOJ activity on ADA changes has been scaled back due to the terrorist attacks of September 2001.

Step 4: At the time of adoption, the DOJ can specify the phase-in time for the new regulations. The DOJ may allow as much as two years for manufacturers to comply with the talking requirements of the new rules. The regulation will address if, how, and when the changes apply to existing ATMs.

The Installed Base

The proposed rule changes will certainly affect all new ATMs installed after some as-yet undetermined cut-in date. However, it is not clear how the changes will apply to the installed base of equipment,

estimated to reach in excess of 325,000 terminals by the end of 2001. The Department of Justice will make that determination.

There has been much talk in the industry about upgrades. Many large banks are expecting to be required to upgrade and have already started the process. Their belief is centered on the idea that the current law could be interpreted to require some form of speech. Bank of America has openly committed to upgrading 7,000 of its ATMs by 2005. Bank of America has already upgraded several hundred existing terminals.

While some banks are already pursuing upgrades, others are blissfully unaware of the impending changes and the spate of lawsuits. Most small, retail ATM owners are only just now learning of the ADA's impact on ATMs. Large retail owners are probably in the best position today. Some of these owners are already taking action, requiring their new installations to be speech-capable.

As the new ADA guidelines are put into effect, it will take some time to determine what will happen with regard to the installed base. The expectation is that some of the existing terminals will have to be upgraded. Which ones will be affected is unclear. A large bank with presence in multiple states may have to upgrade at least one ATM in each location to talk, while some small convenience store owner with only one or two ATMs may not be affected. The life span of the ATM terminal also may play a role in the upgrade plan. If a terminal's design life is five years, it may be replaced before an upgrade will ever be required. If the design life is 20 years, however, then it may be affected.

The Technology of Talking ATMs

ATMs can be classified into two general categories of technology:

- * Terminals that have a personal computer as the central controller and run a commercially supported operating system, such as OS/2 or Windows, represent the high end of the market.
- * Terminals that do not have a PC as the main controller represent the low end of the market. These are most commonly referred to as embedded systems, which feature proprietary electronics and software that have been purpose-built for the product. These systems are typically less expensive than the PC-based terminals.

Making an ATM talk is a task that can range from trivial to extremely difficult. On a high-end PC-based terminal, speech capability can be accomplished in two basic ways. Each method has advantages and disadvantages.

The first and most commonly used method is to employ .WAV files. This is a specific file type supported by OS/2 or Windows that is the digital equivalent of a tape recording. When a .WAV file is "played" on the PC, it sounds like a pre-recorded voice.

The advantages of .WAV files include:

- * They can be played on low-end PC's.
- * The quality of speech is very good. It can sound just like the human voice.
- * They can be played through the PC speaker and do not usually require a sound card.

The disadvantages of .WAV files include:

- * .WAV files must be pre-recorded, most often from a human voice. This can prove challenging when changes are needed, adding difficulty to maintaining consistency in voice recording.
- * It is impractical to record all possible words or phrases that are needed to support the program.

The second technology employed by high-end terminals is text-to-speech synthesis software, which turns text into speech.

With text-to-speech software, the following advantages exist:

- * The software can translate and deliver verbally any word or phrase that can be put into text form, providing all of the flexibility needed to complete any type of self-service transaction.
- * There is no human talent required to record phrases.

There are several disadvantages of text-to-speech synthesis software, which include:

- * It requires a much more powerful PC than .WAV files. Generally, a fast Pentium II or better processor is needed to adequately run the speech software without degrading the rest of the ATM application.
- * The synthetic voice does not sound human, although most people easily understand it.

Many ATMs currently installed do not have the processing power to run text-to-speech synthesis software. For these, .WAV files are the only practical option. Only the newest generations of PC-based terminals from the major manufacturers have the processing power to run text-to-speech software.

It is currently not practical to comply completely with the proposed ADA changes with .WAV files. Many banks offer the ability to "name" secondary accounts, such as "Vacation Account." Banks and their ATM systems that support Open Account Relationship (OAR), where users have access to all of their accounts, cannot anticipate all possible names for user accounts. With text-to-speech synthesis software, this is not a problem. The name of the account is simply fed into the software and it is spoken.

For embedded system-ATMs, there are fewer choices. Typically, these systems cannot play .WAV files, nor do they have the ability to run text-to-speech synthesis software. To support speech capabilities, these devices must rely on additional hardware capabilities that can play prerecorded phrases of dedicated micro controller systems that are designed to convert text-into-speech. This approach can add greatly to the cost of these systems, which are typically designed for the low end of the marketplace.

Web Sites of Interest

Government

- * The Access Board www.access-board.gov
- * The Department of Justice www.usdoj.gov

Blind Organizations

- * The National Federation of the Blind (NFB) www.nfb.org
- * The American Council for the Blind (ACB) www.acb.org

Industry

- * The American Federation of the Blind (AFB) www.afb.org

Industry

- * The American Bankers Association (ABA) www.aba.com

Appendix A

This section contains the complete text of the 1990 ADA regulations pertaining to ATMs.

4.34 Automated Teller Machines.

4.34.1 General. Each machine required to be accessible by 4.1.3 shall be on an accessible route and shall comply with 4.34.

4.34.2 Clear Floor Space. The automated teller machine shall be located so that clear floor space complying with 4.2.4 is provided to allow a person using a wheelchair to make a forward approach, a parallel approach, or both, to the machine.

4.34.3 Reach Ranges.

(1) Forward Approach Only. If only a forward approach is possible, operable parts of all controls shall be placed within the forward reach range specified in 4.2.5.

(2) Parallel Approach Only. If only a parallel approach is possible, operable parts of controls shall be placed as follows:

(a) Reach Depth Not More Than 10 in (255 mm). Where the reach depth to the operable parts of all controls as measured from the vertical plane perpendicular to the edge of the unobstructed clear floor space at the farthest protrusion of the automated teller machine or surround is not more than 10 in (255 mm), the maximum height above the finished floor or grade shall be 54 in (1370 mm).

b) Reach Depth More Than 10 in (255 mm). Where the reach depth to the operable parts of any control as measured from the vertical plane perpendicular to the edge of the unobstructed clear floor space at the farthest protrusion of the automated teller machine or surround is more than 10 in (255 mm), the maximum height above the finished floor or grade shall be as follows:

Reach Depth		Maximum Height	
<i>inches</i>	<i>millimeters</i>	<i>inches</i>	<i>millimeters</i>
10	255	54	1370
11	280	53 1/2	1360
12	305	53	1345
13	330	52 1/2	1335
14	355	51 1/2	1310
15	380	51	1295
16	405	50 1/2	1285
17	430	50	1270
18	455	49 1/2	1255
19	485	49	1245
20	510	48 1/2	1230
21	535	47 1/2	1205
22	560	47	1195
23	585	46 1/2	1180
24	610	46	1170

(3) Forward and Parallel Approach. If both a forward and parallel approach are possible, operable parts of controls shall be placed within at least one of the reach ranges in paragraphs (1) or (2) of this section.

(4) Bins. Where bins are provided for envelopes, waste paper, or other purposes, at least one of each type provided shall comply with the applicable reach ranges in paragraph (1), (2), or (3) of this section.

EXCEPTION: Where a function can be performed in a substantially equivalent manner by using an alternate control, only one of the controls needed to perform that function is required to comply with this section. If the controls are identified by tactile markings, such markings shall be provided on both controls.

4.34.4 Controls. Controls for user activation shall comply with 4.27.4.

4.34.5 Equipment for Persons with Vision Impairments. Instructions and all information for use shall be made accessible to and independently usable by persons with vision impairments.



Text Amendment #2002-0004

ATMsAttachment 6

August 7, 2002

Mr. Ken Moore
President & CEO
Alexandria Chamber Of Commerce
801 No. Fairfax Street Suite 402
Alexandria, Va. 22314

Dear Ken,

Thank you for the information you sent us on the ATM regulation issue in Alexandria, and for the opportunity to comment.

First, I am in agreement with the issue of trying to preserve the character of Old Town, but I have never seen ATM's as being a major detriment to that preservation effort. As bankers, we want our ATM areas to reflect taste and class which we would hope would enhance our image in the community.

I feel that trying to restrict the size of the working component of the machine is not productive. We operate an NCR machine, but most of the Banks use Diebolds, which I understand would not be in size compliance to the guidelines in Memo#2. The smallest machine available is not always the best machine available, either in terms of consumer satisfaction or provider cost.

The surround of the machine is an area where some restrictions could reasonably be implemented, but some drawbacks are evident. If the machine is full service and accepts deposits, the surround must allow for envelope storage and writing capacity. If the machine is strictly a cash dispenser, then a smaller surround could be used.

One important part of the surround is the waste bin with a small slot which allows for paper waste such as receipts and scratch paper. Without a waste receptacle, the ATM area would quickly become littered, hardly in keeping with the image of Old Town. I am familiar with banks who purchased attractive stand alone trash baskets only to see them filled to overflowing each day with fast food trash.

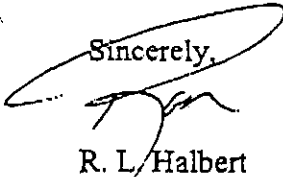
We all like to use our surrounds to advertise our products, which we feel brings value to potential customers. In addition, we need to post the network availability (Star, Plus, Etc) logos, and that may a little crowded on one bank identification sign.

Lighting is a key issue both in terms of security and liability. While reasonable street lighting is available in the historical district, I do not feel that alone is enough to provide adequate security for users. If we cannot use backlit signs, that further cuts down on the candle power in the ATM area. I would recommend adopting increased lighting standards for all ATM's in the district.

Over the last few years, ATM's have become a vital component of a bank's alternate delivery program. Consumers not only want them, they expect them. It is reasonable for a provider to want some limited advertising capability if they are undergoing the cost of providing the machine. Limited may be the operative word here. Surrounds can accomplish their goals without being large billboards which would indeed be out of character for the area. Therefore, I would be in favor of allowing professionally manufactured surrounds, but limiting their size.

As bankers, we strive to be good corporate citizens, and we appreciate the efforts of our Chamber of Commerce to solicit our views on matters pertaining to our industry.

Sincerely,



R. L. Halbert
Vice Pres. Cardinal Bank Alexandria

VIRGINIA COMMERCE BANK

August 8, 2002

Text Amendment #2002-0004
ATMs Attachment 7

Peter A. Converse
President & CEO
By Direct Mail and Facsimile
to (703) 739-3805

Mr. Ken Moore
President & CEO
Alexandria Chamber of Commerce
801 N. Fairfax Street, Suite 402
Alexandria, VA 22314

Dear Ken:

Thank you for allowing us the opportunity to comment on potential regulations on Automated Teller Machines (ATMs) in the Old and Historic District in Alexandria. The historic character of Alexandria is important to the economic vitality of the city, particularly the retail businesses in Old Town. It is our desire that appropriate regulations can be formulated which balance the importance of Old Town with the need to provide a secure, convenient environment for ATMs.

Below are our comments concerning the proposed regulations:

ATM Location

We agree with the staff recommendation that no changes should be made to the regulations concerning location. We agree that ATMs should not be installed on the exterior of a contributing structure to the Old and Historic District – they should only be located in the commercial zones, and not facing residential areas. One area of concern should the city wish to promote ATMs in alcoves or on walls which do not face the street, should be the security of the area and the safety of citizens using the ATMs. Regulations should not be promulgated which encourage ATMs in these locations at the expense of safety and security. Street-facing ATMs in some instances may be the best option for safer environments, since they are often places of activity, often well-lit, and do not afford hiding places for those looking to perpetrate a crime.

ATM Components

We would endorse a recommendation which establishes a maximum size for the entire ATM installation, including the machine, bank sign, and the surround (Alternative #3). Such a regulation would permit sufficient flexibility to incorporate the various components of an ATM installation, allowing for some creativity in the design of required signage and tasteful presentation. We would encourage an overall dimension which would be sufficient to incorporate the various components...a total area of 18 square feet seems to be sufficient in our opinion. We would also encourage the inclusion of an overhang subject to the approval of the Board of Architectural Review. Such an overhang could add to the overall appearance while permitting protection from inclement weather and a shield for lighting which is also a concern of the city planners. Regarding

the possibility of an oversized sign, we seriously doubt that such an occurrence would take place as the presence of the machine would largely dictate the size of any sign, and since our understanding is that these regulations cover full-service ATMs, the machine would dictate the size of any signage.

Lighting

We would endorse a regulation permitting light levels to be increased for 2 to 5-foot candles measured at a radius of five feet from the source. It is important to emphasize that safety and security are our prime objective in the lighting of an ATM. Visibility of the machine is important, but not nearly as important as safety of the ATM-user. Five foot candles as a standard seems reasonable, and the inclusion of a tasteful overhang would permit lighting to be both shielded and directed while still maintaining a safe environment.

ADA Accessibility

We fully recognize the need to be compliant with the Americans with Disabilities Act. In fact, our stand-alone ATM at Cameron Station is the first ATM in Alexandria with provisions for those with sight impairments (i.e. audio capabilities). Any amendments enacted by Congress should be incorporated into the proposed regulations and be applied evenly both within and outside the historic district.

Waste Receptacles

We would encourage a provision for waste receptacles to be built within the surround of any ATM, and sufficient provision of space should be permitted in the allowable size specifications for the ATM components. It is our experience that waste receptacles built into the surround are highly preferable if the expectation is to encourage their use. Absence of a proper waste receptacle will lead to unsightly litter which is not acceptable to the Bank, the City, residents or visitors. If you wish for people to use the trash bins, then we suggest they be provided. A trash receptacle nearby will not be used as readily as a trash receptacle built into the surround of the ATM.

Grandfather Provision

Finally, we would encourage the inclusion of a grandfather provision into any new regulations to be considered by the city allowing existing ATMs to remain in their present condition and requiring that they be brought into compliance with new regulations as they are replaced or upgraded. We believe such a provision would be fair to all concerned while establishing an expectation in the community that future ATMs and replacement ATMs will maintain an appearance which is respectful of the Old and Historic District. Further, we would request that our ATM located in the 500 block of King Street be included in this grandfathered status as we feel that Virginia Commerce Bank acted in good faith and compliance with city regulations when it was installed. Should our ATM at this location be changed in any significant manner, we would gladly

bring it into compliance with the new regulations should they be enacted by the City Council.

Furthermore, we respectfully request that this ATM be granted an approved status as it exists today since it has yet to be formally approved by the City. While we regret any controversy which the installation of this machine has caused, it has always been our intent to comply with city regulations, and representatives of the Bank have always acted in good faith to be compliant with these regulations.

Thank you for this opportunity to provide input into the proposed ATM regulations. If I can be of further assistance in the approval process, please don't hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Peter A. Converse". The signature is written in dark ink and is positioned above the printed name.

Peter A. Converse

Automatic Teller Machines

Text Amendment #2002-0004
ATM Regulations for Historic Districts
September 3, 2002

Process

Consultants

Work group

Proposed Text Amendment

No changes:

Process

Location

Lighting

ADA

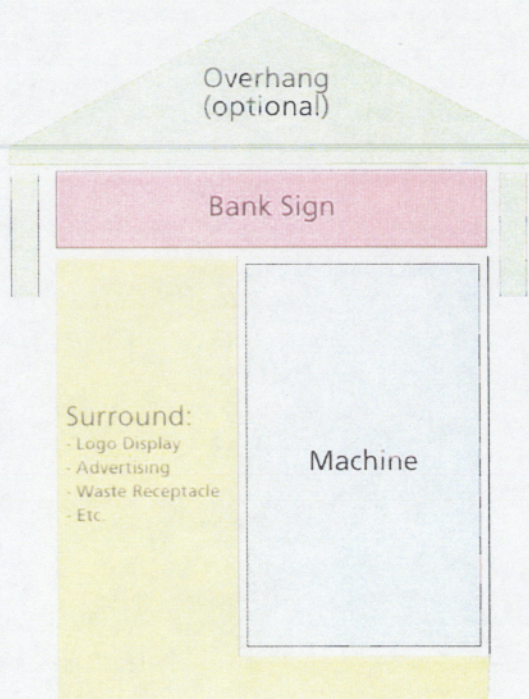
Changes:

Size

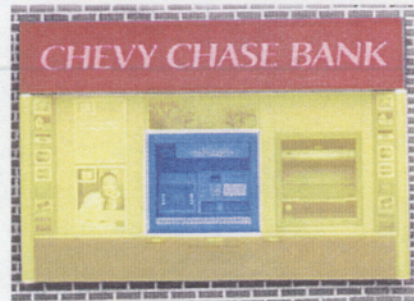
Signage

Surround

1. ATM COMPONENTS



Total Size: 108"x72" (54 sf.)



Total Size:
47"x66" (22 sf.)



Total Size:
56"x70" (27 sf.)

- **Minimum Commercial Size:**
(Full service, exterior fascia surface)

27.8"x32.6"

- Typical Size in Alexandria:

31"x48"

- Alexandria's Regulation:

23"x37" max.

Min. 2.5 in.

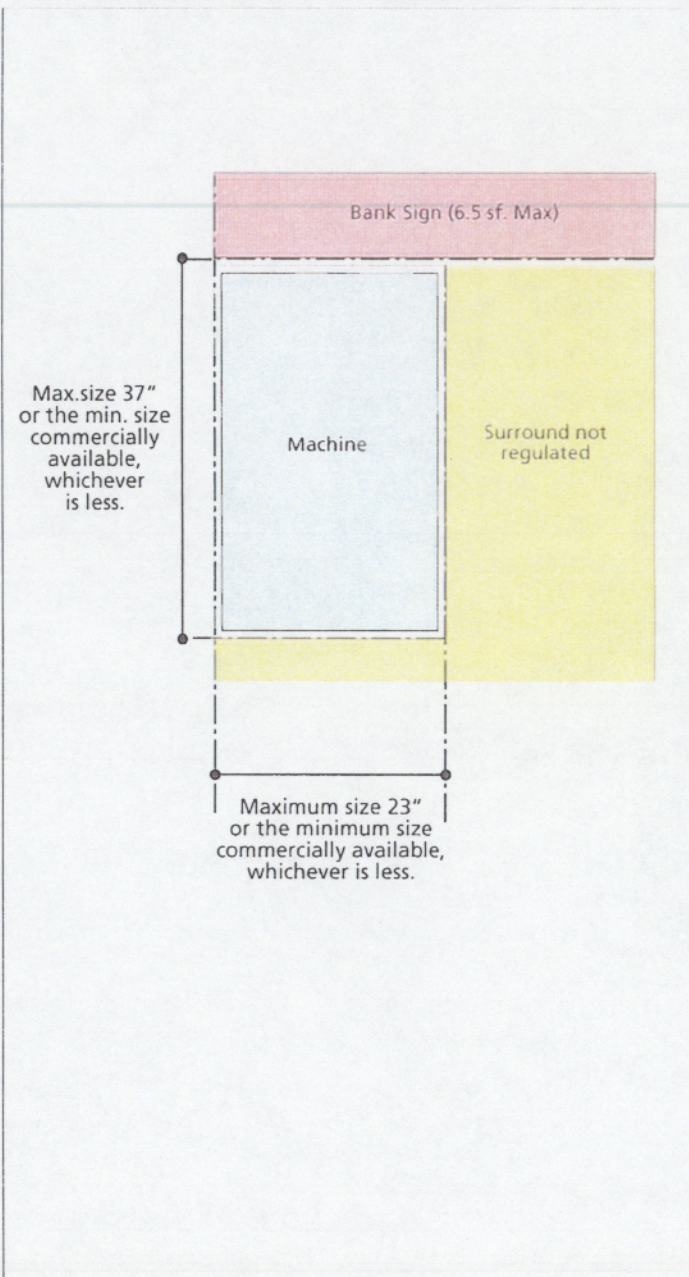


Logo size per network companies

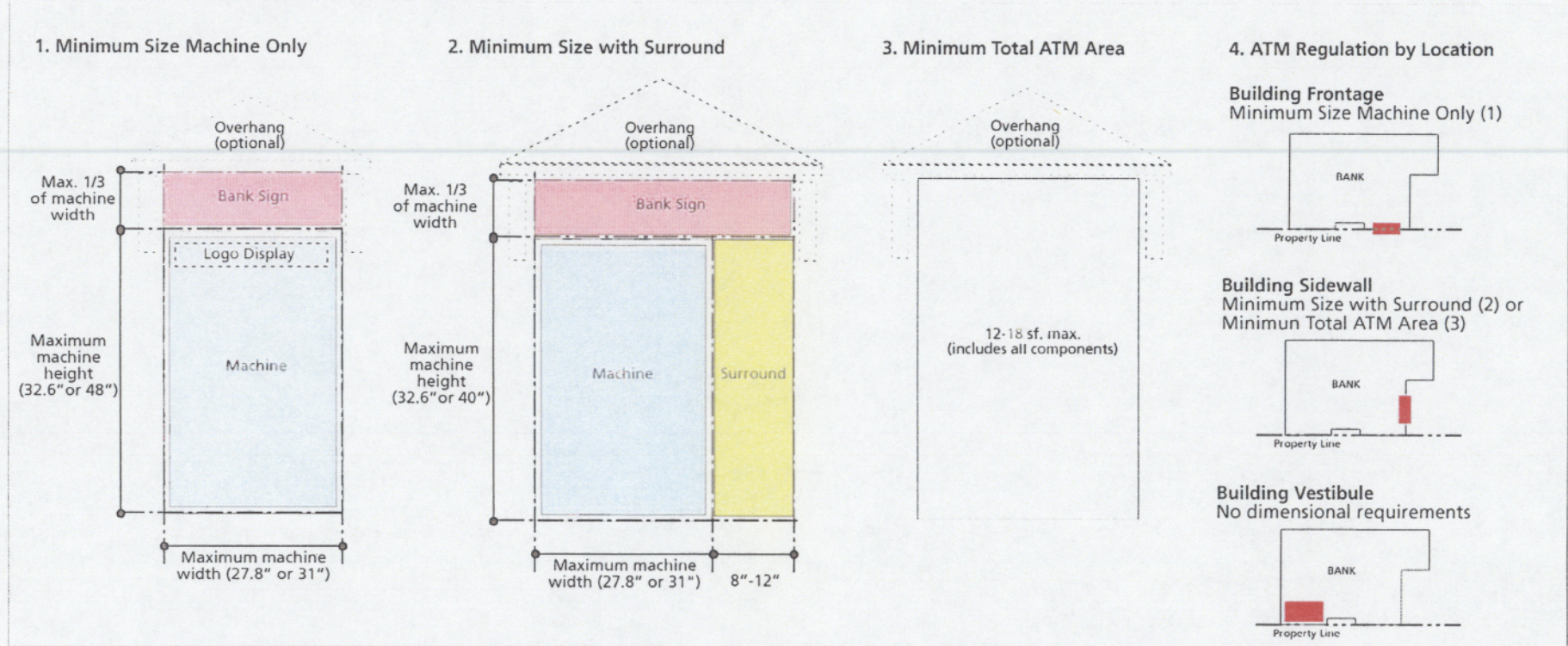


Min. 2.5 in.

2. CURRENT ATM REGULATION



3. ATM COMPONENT ALTERNATIVES



4. APPLICATION OF ATM COMPONENT ALTERNATIVES



Alternative 1



Alternative 2

30
9-14-02

savery@erols.com

09/13/02 10:12 AM

To: wmeuille@wdeuille.com @ INTERNET, delpepper@aol.com @
INTERNET, mayoralx@aol.com @ INTERNET,
council@joycewoodson.net @ INTERNET, dspeck@aol.com @
INTERNET, eberweincouncil@comcast.net @ INTERNET, Beverly I
Jett@Alex, billclev@comcast.net @ INTERNET

Subject: Docket Item 24. Amending the Proposed Zoning Ordinance to
Require Talking ATMs

The Alexandria Commission On Persons With Disabilities (ACPD) requests that Docket Item 24, the Consideration of an amendment to Section 7-1800 of the Zoning Ordinance to revise the automatic teller machine (ATMs) regulations within the Historic Districts of Alexandria be modified to have these ATMs require talking technology to make these ATMs accessible to blind and visually impaired citizens of Alexandria. The Commission joins Virginia Commerce Bank in requesting that this proposed zoning ordinance be modified so that blind customers and citizens of Alexandria will not be discriminated against and denied the opportunity to use the ATMs authorized by this proposed code.

As indicated in the Docket Memo, for this proposed code change, the Alexandria Commission on Persons with Disabilities was offered membership on the work group that developed the proposed zoning code revisions. However, a member of the Commission was unable to make the one meeting convened to develop the revisions in the zoning code. To compensate for an inability to participate in what turned out to be the one and only meeting of the work group, the Commission provided Planning Staff a White Paper that was prepared by a national work group of the Federal Government's Compliance Board that was revising National ADA ATM requirements to include talking technology to enable blind persons to privately and independently conduct banking financial transactions by following the spoken menus used by ATMs. The White Paper developed by a group consisting of representatives from the banking community, ATM technology companies, blind customers and other interested parties, developed a consensus-based document that was proposing revisions to the ADA standards relating to ATMs to assure that ATM technology more fully met the need of blind and other citizens with disabilities. This group of national experts were aware that the current ADA requirements for ATMs were deficient because, among other things, the current ADA provisions required Braille button labels when many blind persons, especially older citizens, could not read braille. Moreover, the Braille button labels did not track the menus and the financial transactions occurring once the buttons were pushed.

When the representative from the Alexandria Commission on Persons with Disabilities learned that the work group had developed code provisions that did not require Talking ATMs, a request was made to have the work group reconsider its decision. Staff did discuss this White Paper in some fashion with members of the work group, without convening a meeting to discuss the Commission's proposal in detail. Planning Staff felt that the schedule for

completing work on this revision to the Zoning Code did not permit a second meeting of the work group. Because the Planning Commission met on September 3rd, the day after Labor Day, to consider and adopt the Zoning Ordinance change, the representative of the Alexandria Commission On Persons with Disabilities was not able to provide testimony due to his family's vacation schedule.

While Planning staff was open to airing the Commission's proposal to require a provision to have the Zoning Code revised to have Talking ATMs in the Historic District of Alexandria, its predetermined short time schedules during the Labor Day holiday season eliminated such an opportunity to revise the work group's hastily developed proposal.

The Docket Memo indicates that the proposed Zoning Code revisions meet ADA requirements. However, these ADA requirements are in the process of being updated to correct deficiencies.

Alexandria has a commitment to excellence, and excellence as applied to the approval of these zoning Code changes is adopting emerging ADA standards and not adhering to the obsolete standards that were approved at a time when talking technology was at an early stage of development. The Virginia Commerce Bank has exercised its leadership by installing Talking ATMs at its new sites, such as the one at 185 Sommerville Street. Other banks such as the Bank of America, and many other national banks, are installing talking ATMs as well.

The Docket memo also recommends that the Alexandria Commission on Persons with Disabilities work with the City to amend the ATM code requirements for all ATMs in other parts of the City to require Talking ATMs and then reamend the ATM code requirements that are before you today. This code amendment process seems cumbersome and inefficient to me. A better strategy is to amend the ATM Code provisions that are before you today to require Talking ATMs to be followed by amending the City's general ATM Code Provisions to require Talking technology, enabling blind citizens to conduct banking activities like other citizens of Alexandria.

I hope that as a Member of City Council you will exercise your leadership to support a technical amendment to the Zoning Code for ATMs in Historic Alexandria to require the talking technology for this area that is being adopted by progressive banks like Virginia Commerce Bank and other national and local banks throughout the country. I apologize for not being able to appear to present this request in person, but a long standing out of town appointment has made it impossible for me to do so. I want to thank you for giving this proposal to amend the Zoning Code on ATMS in Historic Alexandria to make them accessible to persons with disabilities your full attention.

Chet Avery, Member

Alexandria Commission On Persons With Disabilities.
Chet And Sabra Avery
16 East Linden Street
Alexandria, Virginia 22301
Tel 703 549-4617

TEXT AMENDMENT # 2002-0004

ISSUE DESCRIPTION: to REVISE THE AUTOMATIC TELLER
MACHINES (ATMs) REGULATIONS WITHIN
THE HISTORIC DISTRICTS OF ALEXANDRIA.

ZONING ORDINANCE SECTION: 7-1800

CITY DEPARTMENT: PLANNING + ZONING

ACTION - PLANNING COMMISSION: 9-5-2002 RECOMMEND APPROVAL.

7-0

ACTION - CITY COUNCIL: 9/14/02PH--CC approved the Planning Commission
recommendation.

#30 9/14/02

City of Alexandria, Virginia

MEMORANDUM

DATE: OCTOBER 30, 2002

TO: THE HONORABLE MAYOR AND MEMBERS OF CITY COUNCIL

FROM: PHILIP SUNDERLAND, CITY MANAGER *PS*

SUBJECT: ATM MACHINES

At Council's public hearing on September 14, 2002, during the discussion regarding the proposed zoning amendment on ATM machines, Barbara Gilley, on behalf of the Commission on Persons with Disabilities, spoke about new technology that makes ATM and other machines more accessible to the blind than the technology currently required. Council asked that staff pursue the issue further.

On September 28, Barbara Ross, Deputy Director, Planning and Zoning, met with the Commission. A work group including Commission members and others was formed to look closely at the question of the proposed new technology, i.e., talking ATMs. Staff from the Department of Human Services will support the group and advise Council of its findings.

cc: Michele Evans, Assistant City Manager
Jack Powers, Director/Community Programs, Department of Human Services