

To whom it may concern:

My name is Alan Conway. I am a blind person with considerable travel experience in the federal transportation system. I have read the background document containing the email address I am using to make this submission. I am also aware that some things I may raise may not fall directly under federal jurisdiction, but have a direct impact on accessibility for persons with disabilities. In such cases, ways must be found to insure that someone takes responsibility for filling the gaps where they exist.

## 1. Intercity Bus Transportation

While not all intercity bus transportation is interprovincial, companies such as Greyhound offer a service that actually makes it possible to travel across our country by bus, so its activities can and certainly do have an impact on national transportation. For many years, the Saskatchewan Transportation Company operated a service to several small communities that otherwise would have nothing. Now that Greyhound operates that service, many communities in Saskatchewan have seen their bus service seriously reduced. I know, for example, that the town of East End Saskatchewan now has access to only one bus a week from Saskatoon. If service to other larger cities is equally compromised, I can well imagine that the people who live in remote locations, including anyone with a disability, would have considerable trouble getting to such places as Regina to see health professionals or transact other business that can only be done in larger centres. Although I doubt that the present provincial government would step in to assist, especially since it allowed Greyhound to act as it has, I think it might be helpful to adopt some kind of measures to increase the availability of service. Of course, if help is provided, any company must agree to stricter access regulations. I do not have any miracle solutions, but bus companies have long complained that they would offer better service if they got subsidies. Perhaps this kind of carrot and stick approach might be helpful.

Another access problem involves attempting to get seats on Greyhound buses. Greyhound has introduced an inaccessible online reservation system. It used to be possible to arrive at the bus depot in larger centres such as Ottawa and take the next available bus, but this is now impossible, even when arriving several hours before departure. The online reservation system is not accessible to the screen reader technology that people with very severe vision loss need to operate computers and when attempting to call the local number that was once used, the caller is referred to a toll-free number leading to a reservation system that can best be described as cumbersome. Among other things, the system has too few categories and callers are forced to search through long lists of cities served by the company. The listing is in alphabetical order, but American and Canadian destinations appear in the same list., My wife told me that she attempted to use it to reserve a trip to Montreal, but she gave up in frustration when trying to do so by telephone. The result is an extremely unreliable transportation service if you are a person with a disability. I do not personally believe that the present voluntary codes of practice will solve this situation. After all, when Greyhound introduced this new reservation system, it certainly could have done so with greater accessibility in mind, but such is definitely not the case and I am absolutely certain that no-one with a disability was approached to test it. Any telephone reservation system should provide an option allowing a caller to speak to someone who can make a reservation quickly. It goes without saying that the operator must be able to speak English and French fluently, but I feel compelled to mention it, since many companies have a propensity to subcontract such work to people in other countries, without regard for the reality behind our linguistic duality.

## 2. Access to Trains

When I think of access to trains, one of the first things that comes to mind is the number of Via Rail stations that are presently unstaffed. I am not prepared to say that the result has been that I missed a train, but I have been told by the one person at the particular station that I would get help if he or she

had time. This is definitely not equal access to service and there are occasions where it is not possible to simply go somewhere else where available staff might be present to help a disabled passenger catch a train.

Although Via Rail has a website that is partially accessible, it is definitely not easy to make reservations online. It is certainly possible to call, but it is also true that the present site is less accessible to screen reader technology than previously.

In a recent consultation, Via Rail asked passengers with disabilities to comment on the kinds of amenities they would like to see on board new trains to be rolled out in the near future. While the company seemed open to many suggestions regarding signage and accessibility of cars, it is my understanding that it intends to do away with service to passengers at their seats, in favour of an approach where all passengers would use a dining car. I have never had one of my guide dogs get hurt while walking from one car to another on a moving train, but I would personally rather not take that chance. I think any new regulations have to include the possibility of offering service at a passenger's seat. Here again, I do not think that leaving these matters up to voluntary codes will insure proper service. Doing so will only perpetuate unequal access.

### 3. Access to Aircraft

Much progress has already been made regarding access to various types of aircraft. Among other things, we have seen recent decisions that require airlines to provide extra space for assistance dogs on flights within Canada and a one person, one fare policy that is certainly beneficial to some who take domestic flights. I would suggest, however, that airlines should be required to show cause why these rulings should not apply when travelling internationally.

Decisions regarding the Americans with Disabilities Act, force foreign carriers to apply ADA rules on flights that serve the US. It is unclear to me if foreign carriers who serve Canada are also required to follow our rules. I think it is important to insure that our own rules are followed by foreign carriers that serve Canada. In other words, if a foreign carrier serves our country, it must be required to transport assistance dogs in a way that we as handlers could normally expect here in Canada.

I will now deal with the matters outlined in the consultation document. I have already touched on some of them, but these few comments should help to summarize previous writings and provide additional information.

#### \* One-person, one-fare

This is not an option I have ever used, since I travel with a Seeing Eye dog, but for those who choose it, I fail to see why its application should only be limited to domestic flights. I presume that the same people who need this kind of help in Canada may well need it on those occasions when they may choose to travel overseas. Consideration should also be given to which other airlines should be required to provide this accommodation. It may be that service to some small communities may be difficult. I have had occasion to fly in some very small aircraft. In one case the airplane was small enough that it would have been exempted from Transport Canada's regulations regarding the transportation of guide dogs, since it only had eleven seats. The aircraft was not full, so the pilot said nothing and I boarded. In such cases, I think a study needs to be carried out to determine what needs to be done to insure that people with disabilities will in

fact be accommodated on rare occasions when they may need to travel from very small communities.

\* Allergies

I do not have any allergies that affect my ability to travel, but speaking as a guide dog handler, I would now like to discuss such matters from a guide dog handler's point of view. The accommodation of allergy sufferers has taken on increased proportions in recent years. The CTA has had to deal with an increasing number of complaints regarding these situations and it is my belief that generally things have been handled very well. However, I would like to comment that many people who have allergies seem to expect accommodations without declaring their condition. When I travel with my dog, I inform the airline that he will be with me. I have heard of many situations where people with allergies have not done so when they travel, only to complain about a situation they encountered later on.

In the same way that many people who acquire a disability do not want to admit it, I suspect the same is the case for some people who have allergies. If any change is to be made to existing regulations, it needs to be made clear to allergy sufferers that if their allergy could be impacted during transportation, they must do as we do and declare it to the carrier. I have never been removed from an aircraft under those conditions, but it must be clear that once an airline or some other carrier has confirmed a reservation, the access rights of that person are protected.

\* Service animals

I have considerable experience travelling with Seeing Eye dogs. Since May 1979, four highly trained dogs from The Seeing Eye in Morristown New Jersey have guided me to locations in all ten provinces and in the Northwest Territories.

In most cases, I can say that I have not experienced particular difficulties, but I feel that the high turnover of staff and the resulting gaps in training screening staff receive have certainly caused difficulties. I have participated in a training video meant for airline staff that, to the best of my knowledge is still being used today. As I see it, although the video is useful, it is simply made available to employees, who watch it only if they happen to have time to do so. This approach is no guarantee of proper training. In one rare case that I do recall, a member of staff attempted to insert a scanner into my third dog's rectum to be sure he wasn't carrying anything. The employee was totally surprised when my dog backed away from him. I am absolutely sure this man received no training, because if he had, he would have known not to do such a thing. The only solution to such problems is regular updated training, preferably at least every two years. When new employees arrive, this training is one of the first things they should receive automatically. Better quality of training would also result if the company or companies that provide it are run by qualified persons with disabilities.

\* Curbside assistance

This is one of those grey areas where there seems to be considerable difficulty in determining Who is to assume such a responsibility. Where airports are concerned, individual entities have provided various solutions. The Ottawa airport authority has installed telephones that can be used to call for assistance to the counter on arrival. I have never actually used them, but in contrast that situation with the one at the Trudeau airport in Montreal, things are quite different. My wife and I will be taking a trip to Europe at the end of the month. When I called

the Montreal airport to see if we could get help to get to the airline counter when we arrived, I was rudely told that no such service is available. What was worse, the employee I spoke to had no idea at all about trying to navigate unfamiliar surroundings. It seemed to be her contention that if we could take a shuttle independently to arrive at the airport, we could also navigate an unfamiliar building. A further exploration of the various options available when calling by phone turned up a number for a porter service, and I was able to discuss matters with the staff. I was advised to call them for help when we arrive.

While airports have made many important strides in improving accessibility through the use of braille signs and clearer visual indications, this in no way solves the bigger navigation problem encountered when a blind person does not see a given location often enough to form a mental map of the area.

I have no easy solution for this problem. I have interpreted the deliberations of the CTA's Advisory Committee on Accessible Transportation many times and this matter keeps coming up. One problem involves determining what time a passenger who needs assistance will actually arrive at the airport. There is no perfect solution to the situation, but if information is provided to a passenger needing help about telephones designed to contact someone, for assistance, it would be most helpful. Since such devices would not necessarily be located in standard locations, the passenger could simply be asked to contact the airport to find out the location. A cellular number could also be provided for requests for assistance.

Assuming that the airline is informed that a passenger needs help when arriving at his or her destination, there seems to be little difficulty involved, but arriving at an airport for departure definitely causes problems and a solution must be found to make travel for people with disabilities a smoother experience. On a recent trip, I arrived, along with another disabled passenger, at the Winnipeg airport to fly home. The shuttle driver left us at the door and it was the other passenger who actually helped me, since we were both going to the same airline counter. I have no idea if there was a system in place to call for help, but if it existed, the shuttle driver was not aware of it. Another passenger should not find him or her self in the position of having to assist someone with a disability, especially when the helper is also disabled.

Curbside assistance at bus terminals can best be described as uneven. In larger centres such as Ottawa or Montreal, it seems quite easy to have a taxi driver find a security guard who is willing to help, but such assistance is not always available. The problem is compounded by the fact that in smaller centres, buses often stop at restaurants or convenience stores. In such cases, help from the bus driver is essential.

I have had few problems getting assistance with trains, but I know that Via Rail has cut back many positions and that many people with disabilities have been negatively affected. Of course, every time service cuts take place those most affected are always reassured that we will not notice the difference. I beg to differ. Numerous reports in the news media often contradict such affirmations.

While preparing for an upcoming trip to Europe, my wife and I have discovered a service called Accès plus. While I am sure not all of its features may be adopted in our context, I think it would be most appropriate for Via Rail and other transportation services to investigate how it works to see what aspects of its services would be applicable in Canada. For more information, please go to the following website:

<https://www.accessibilite.sncf.com/services-aux-voyageurs/services-adaptes/nos-services-d-assistance/acces-plus>

The service is operated by the French railway system, but I am sure that airport authorities, companies such as Via Rail and regulatory bodies such as the CTA can benefit from learning how this service operates. I would caution against using the kinds of inaccessible registration forms available on the website.

\* Accessible in-flight entertainment

While such a matter may not be of major importance to some, I consider it very important. When I worked as a conference interpreter for the government of Canada, I could take advantage of the older systems that allowed me to not only benefit from the entertainment, but also listen to the news in both official languages. I cannot read newspapers and access to the information through the system was extremely important, because political events definitely have an immediate impact on the assignments interpreters receive. When changes were made to that technology, I was deprived of that information. In addition, when I pay for a product or service, I expect to be able to use it as others do.

It is my understanding that the Canadian Human Rights Commission recently helped to settle a complaint involving two blind people who felt that their rights were violated when Air Canada's in-flight entertainment system turned out not to be accessible. I am pleased with the resolution and congratulate the complainants for persisting, when the CTA determined that the matter was not under its jurisdiction.

Technology now exists that can make such systems highly usable. Given that a complaint has already been resolved, the situation for Air Canada may be clear, but it must also be clarified for other airlines that offer in-flight entertainment. As pointed out in the background document, trying to solve one case at a time is turning out to be a most unworkable process.

I thank you in advance for considering my comments and remain available to answer any questions that may result from this submission. If you require additional contact information, please respond to this email.

Warmest regards:

Alan Conway