

**September 4,2016**

**Subject: Accessible Transportation Consultation**, Canadian Transportation Agency (CTA).

**To: Accessible Transportation Consultation**  
[consultations@otc-cta.gc.ca](mailto:consultations@otc-cta.gc.ca)

Dear Sir or Madame,

Completely blinded in a car crash (1977). I obtained training in the accepted theory and practice in how to achieve orientation and mobility through the use of a white mobility cane. In 1985, however, I researched and came to a quick conclusion how a guide dog would reduce anxiety and increase access to fast, as safe or safer, spontaneous and unrestricted orientation and mobility. My current certified guide dog (Guide Dogs for the Blind Inc., San Rafael, Ca.) and I make daily use of public and commercial transportation programs and services (Air Canada, Harbour Air Seaplanes, BC Ferries Services, Greyhound of CANADA, taxi, Coast Mt. Buses and Metro Vancouver light rail. The primary concern in this submission is out of concern for accessible, inclusive, positive, safe and welcoming air travel products and services for consumers with impairments to health.

- 1) I make daily use of information technologies supported by screen reader software (JAWS) in both personal and professional life. My experience in attempting to make on-line reservations at both the Air Canada and Aeroplan sites, is the information technology design on the back end prevents independent access to the travel information service. Consequently, I make use of the 1 800 live agent service to complete the same as that passenger who does not have barriers to accessing print. Subsequently, I am penalized by paying an additional service charge. Booking directly through the airline, it invariably becomes a laborious exchange to ensure the details of my Special Services Request (SSR) and to ensure arrangements for my guide dog have been accurately documented. More time can be spent on the phone between the reservations agent and the Meda Desk on every single reservation to confirm my SSR and data required on my guide dog than time in a flight duration! Air Canada needs to address accessible information technology, discriminatory service charges, and passenger profiles that, for example, follow the passenger with the authentic data the airline insists be a part of each and every reservation. When I get sighted assistance to complete either an AeroPlan reservation or a revenue reservation with Air Canada, there is no message field to input I travel with a guide dog or the details of an SSR. Consequently, a passenger traveling with a guide dog or service dog is relegated to calling the live reservations agent which results in a service charge. If I avoid this step and show up at the airport ticket position, I am reprimanded for not letting the airline know when making the reservation I am traveling with a guide dog and on a full domestic flight, lose the opportunity for my guide dog to travel comfortably and in a location which does not threaten safety on the isle or reduce the feet space area of a passenger sitting beside me. And then there is the problem created for cabin crew when I have been assigned by the reservation computer system those seats adjacent to an emergency exit! Can we say, flight delays?

2) the Air Canada Meda Desk and the reservations agents, given the nature of the sophisticated information technology utilized, surely can simplify the information exchange about a guide dog or service dog when I self-identify I am traveling with this form of mobility aid? For passengers traveling domestically, Air Canada will assign the seat beside me to adjust for and accommodate: adjacent passengers, safety, and inflight service – most appreciated for our guide dogs and service dogs are as well prepared for the responsibilities they undertake upon arriving at our destinations. However, please

see the attached file from Air Canada, the data I have to give the reservations agent and in turn to the Meda Desk. Why cannot this field of information be given only once to the reservations agent and transferred internally to the Meda Desk? This is a very time consuming process to have to complete this information exchange with two agents on every single reservation initiated.

3) Getting assistance from a passenger ticket agent and upon arrival at my destination, invariably results in elevated anxiety. Agents are not versed in the accepted information and methods for providing sighted guide assistance. Yes, the individual passenger needs to take initiative as an agent should not have to be guessing levels of visual impairment. However, a guide dog is not trained to heel beside me if the agent has insisted I make use of the wheelchair they have offered. My guide dog does not ride comfortably or SAFELY on the short wheel base golf cart (five passengers including agent). Having had a guide dog fall off such a cart, it is not worth injuring or ruining the career of one of our wonderful, trusted, and loyal guiding companions. I should not and cannot use a set of stairs or an escalator if not forewarned on an approach. And NEVER EVER walk my guide dog and me onto a moving sidewalk! Not only does the agent assisting me not know where the most immediate emergency stop button is, does this agent understand what I or we will do with a guide dog that hesitates as the sidewalk disappears under the expansion joint at the end of the walk! Let's talk about ruining a guide dog career and what a horrific event to unfold before the eyes of passersby! If the airlines do not emphasize and re-stress the information explaining the appropriate forms of assistance and for interaction during training with a disabled, aging, or senior citizen passenger, errors in judgement are naturally going to result and more to the point, management issues and legacies concerned with liability. The SSR encoding language must be updated and standardized across the aviation industry and MUST, repeat, must accompany the passenger on code shared flights!

4) Please put steps in place to standardize and keep current the knowledge and skills of Canadian Airline Transportation Security Agency (CATSA) screening employees of what to know and how to screen a passenger accompanied by a guide dog or service dog! Please!

5) As the legitimate popularity of expanding one's freedom, safety, and independence increases through acquiring a guide dog or service dog, reasons to travel by air for personal and professional reasons are going to trend higher. The CTA in collaboration with recognized professional consulting firms such as Canadian Barrier Free Design Ltd. (subsidiary of the Rick Hansen Foundation) identify a timeline with steps to complete for the provision of guide dog and service dog relieving areas at Canada's airports (domestic and international departures and arrivals).

6) Should the guide dog or service dog handler be charged a baggage fee for that bag containing food, grooming, bedding, and associated health care items for our certified dogs?

7) Other than the regulatory bodies, what is the difference in the air space over Canada and that of the United States when it comes to the seat allocation provision for a guide or service dog in Canadian air space that does not apply the instant the aircraft crosses south over the 49<sup>th</sup> parallel? The regulatory bodies were seemingly not at the same meetings when this agenda topic was tabled. A guide dog or service dog that flies comfortably and safely is a companion that can be depended upon at a destination. The same dog resting in out of the aisle, does not disrupt in-flight service, nor does the four pawed traveling companion not bother a seat mate if the floor space has been assigned for this most valued and appreciated accommodation. Can we (you) make use of this consultation to get Canadian and American regulators together to exercise and do what is correct and right in terms of the best interests of our guide dogs and service dogs? Thank you.

Sincerely,

Bruce A. Gilmour & golden guide dog Marley

Advocacy Committee Chair  
Alumni Association Board  
Guide Dogs for the Blind Inc.