



Attachment A

Greater Moncton Romeo LeBlanc International Airport

In terms of feedback related to the proposed Regulations for Accessibility, our input would relate to the following two items and highlighted portions:

- **For example, regulations could include the requirement to provide accessible boarding bridges, platforms, or gangways that meet applicable CSA B-651 standards; relieving areas for service animals; and accessible washrooms.**
- **In terms of compliance with the proposed technical standards for each of the modes of transportation, the Agency is considering a requirement for carriers and terminals to obtain the Agency's approval for planned acquisitions of new equipment and major retrofits as well as for the construction of terminals and major renovations which would reasonably be expected to impact access by persons with disabilities.**

Potential concerns with the proposed regulations would be in regards to:

(1) Provision of accessible bridges:

Although our airport makes bridges available, in our particular situation, the airline can opt to either use or not use the bridges provided for embarking or disembarking of passengers. As well, at a smaller airport two bridges may be available but at peak times of day 4 or 5 aircraft may be boarding/unloading simultaneously such that there may not be bridges available for all flights. It is therefore essential that the regulation is such that it does not legislate mandatory use of bridges as it may not be possible to accommodate this for all flights without seriously affecting airline and passenger on-time departures and schedules. We are in agreement that any new bridges procured should meet defined accessibility criteria.

(2) Regulatory red tape:

Requiring TSB approval for construction or purchase of equipment would lead to an unnecessary and additional incremental and regulatory burden for implementation of accessibility measures.

There is no need to incorporate this requirement in the legislation but rather an effort should be put to instead ensuring that clear regulatory requirements are developed, documented and provided to airports and airlines such that they can ensure they are in compliance with the legislative requirements.

(3) Cost burden:

Requiring all airports, including smaller airports (NAS or non-NAS) to meet the same onerous requirements as much larger Tier 1 airports may impose a significant cost burden that may restrict available funds for reinvestment in passenger facilitation initiatives at smaller airports. As such, it is essential that the legislation be carefully drafted out to ensure that the expectations of smaller airports are realistic and aligned with the available discretionary funds of such airports. Otherwise it is possible that investments in accessibility could possibly take away from investments in operational safety and security requirements. It is therefore recommended that regulations take into account the accessibility demand and balance the regulatory requirements and approaches with the discretionary funds available for such investments in smaller airports. Alternatively, TC or the CTA could provide funding for accessibility investments at smaller airports to buffer the compliance cost.

Please do not hesitate to contact us with any questions related to the above feedback on proposed CTA Accessibility Regulations.

John C. Munro Hamilton International Airport

YHM has the following concerns with the proposed regulations:

1. It is unclear what the expectations are of retroactively fitting existing facilities.
2. Service animal relief areas in a secured area will be next to impossible to achieve without considerable impact to security regulations currently in place.
3. Language in the document is very vague and subjective; “dignified”, “where possible”, “information made available” are all subject to interpretation by the public, and it is difficult to understand how the CTA will monitor this or determine if measures taken by terminal operators are adequate as there are no standards around this language.

This is a high level review at this time, but if the CTA requires more detail, they will need to determine implementation frameworks, suggested by passenger volume.

Victoria International Airport

The comments from Victoria International Airport on the Code of Practice, Passenger Terminal Accessibility document are as follows. The comment relates to the paragraph referenced in the document:

- 2.1.1 We currently refer to the CSA design standard, local building codes (BC) and local fire codes. At the last major renovation, we consulted with a local group

of the public.

- 2.2.1 We have curb cutouts at both entryways along with handicap locations along front curb. We also have handicap parking in short and long term lots, closest to north end of covered walkways.
- 2.3.1 We have seating throughout the ATB and at curb areas in the departures and arrivals plazas as well as shelters in the commercial lane.
- 2.3.2 In most cases we comply, but this may require us to add seating inside PBS, or along the east and/west bridge corridors.
- 2.4.1 The airport supplies bridges free of charge to air carriers to encourage use, and has a policy for same. Air carriers also supply ramps for exterior ramp loading operations.
- 2.4.2 Elevators are available in Customs and the central core. There is also an elevator available for the observation lounge and administration offices.
- 2.5.1 We have two pet relief areas available outside the ATB, adjacent to crosswalks. We do not have an interior pet relief area, but could plan one in upcoming expansion plans if required to.
- 2.5.4 Areas are marked with signage; however, there are no directional arrows to these areas. Signs are in English only.
- 2.6 Not applicable
- 2.7.1 and 2.7.2
This is standard practice. Yellow Cab has adapted vehicles for this purpose. Wilson's has contracted with Yellow Cab to provide this service on their behalf, at no added cost to the passenger.
- 2.7.3 Website requirements will be changing over time in a separate initiative by the CTA. However we do have an accessibility page on the website that provides information of what services are available.
- 3.1 Terminal is not complex, and we have an information desk where assistance can be obtained. We do not have information kiosks at this time.
- 3.3.1 and 3.3.2
Comment card program and CSD electronic comment program.
- 3.4 We have an active escort program in place.
- 3.5.1 We describe these features on our website currently. We also provide links to service providers for public information.

3.5.2 We meet some of the criteria currently through our website.

4.1, 4.2, 4.3 and 4.4

We allow persons with disabilities to use the Nexus door at PBS. Signs and staff are available to inform the public. Physical search is offered as an option, and a private screening area exists.

4.7 and 4.8

We currently meet this requirement.

Saskatoon John G. Diefenbaker International Airport

Many of the points are already incorporated into our designs/process/public interface. The risk with transitioning to regulatory compliance is that all will have to be incorporated with capital and operating costs. In addition, it will most certainly increase CTA audit cycles (resource cost) and the associated costs of corrective actions which could be substantive after the fact depending on the issue. In the CAC synopsis page 2 "the Agency is considering a requirement for carriers and terminal operators to obtain the Agencies approval..." is a red flag as this review cycle is not defined and could increase design cycle time significantly.

Finally, what about grandfathering of existing facilities when these items become regulation?

Charlottetown Airport

YYG has reviewed the proposed regulations on disabilities. One thing to note about YYG, a few years ago we were contacted by a provincial body to go under an assessment on disabilities at the Charlottetown Airport. We received three designations; fully accessible, sight accessible and hearing accessible. During this time we made a number of changes around our terminal building to accommodate for disabilities.

<http://accessadvisor.weebly.com/contact.html>

After the review of the proposed regulations below are our comments:

1. Section 1:
 - No issues
2. Section 2:
 - In general, signage would have to be updated around the terminal building to comply with communication code
 - Ensuring all the contracts with ground transporting include the possibility to accommodate disabilities.
 - Updating communication regarding disabilities mainly via our website
3. Section 3:
 - In general, the awareness and methods to notify public would have to be updated
 - Kiosks – currently don't comply

- Customer Service – would require the addition of methods to inform public regarding the disabilities
4. Section 4:
- The majority of this section falls more on CATSA/Securitas. The airport authority already provides the space required for them to provide the service.

In summary, there are no major red flags or concerns from Charlottetown.

Prince George Airport

Prince George Airport's response to the *Passenger Terminal Accessibility: Code of Practice (Appendix F)*, are as follows:

1. Please describe in detail, any significant difficulties that you may have in meeting any of the provisions set out in the Terminal Code (e.g. physical considerations in S. 1; facility considerations in section 2; service considerations in section 3)?

Prince George Airport Authority (YXS) response:

The Agency approval process is not practical due to planning and timing.

2. Please describe any alternative or additional provisions (whether technical standards, facility considerations, service considerations, or other) that you think should be included in the proposed regulations?

Prince George Airport Authority (YXS) response:

We suggest comprising a working group to review the technical requirements and possible other options so the regulations reflect what are a practical implementation.

3. How do you ensure that persons using service animals can access a relieving area (indoor or outdoor) from the secure side of your terminal?

Prince George Airport Authority (YXS) response:

Providing a relieving area on the secure side is not practical. We would implement a policy and procedure for YXS airline representatives to assist passenger and the service animal back through the security screening area to the land side relieving area. The airline rep would assist the passenger and service animal through the security process using a priority process.

4. Please provide your views on the incorporation, in regulations, of the technical standards currently in the Terminal Code referenced in Appendix F.

Prince George Airport Authority (YXS) response:

We suggest comprising a working group to review the technical requirements and possible other options so the regulations reflect what are a practical implementation.

5. Describe any policy you have for ensuring the accessibility of new construction or renovations at your terminal facilities.

Prince George Airport Authority (YXS) response: Any new construction or renovations are permitted through the City of Prince George's building permit process for code compliance.

6. What significant challenges, if any, do you think you might face if you are required to obtain the Agency's pre-approval for new construction and renovations which would reasonably be expected to impact access by persons with disabilities to your facilities?

Prince George Airport Authority (YXS) response: Projects will be delayed and the cost of the projects will be increase due to delays.

In addition, Prince George Airport provided comments on the *CTA's Regulatory Modernization Initiative* document, which is included in the CAC submission and includes the comments listed above.

Winnipeg James Armstrong Richardson International Airport

In summary, the proposed changes appear to address a problem that does not exist for the WAA. We plan and operate with the existing guidelines, but commonly go beyond these requirements because we are responsive to our customers, many of whom have disabilities. It is just the right thing to do.

Prescriptive regulations on the surface appear to be the "next step" in ensuring the needs of persons with disabilities are addressed in providing access to facilities and services. They are not necessarily a long term benefit when they are not outcome based, not flexible, and not able to be changed and adapted on a month to month basis. This has not been the reality with regulations we have seen to date. We care about our customers with disabilities and plan and act with that in mind. Regulations can change the culture from doing what's right, to simply "following the rules".

Overall, the proposed shift from Code of Practice to Regulations is relatively neutral for WAA at this point in time.

Given the recent construction of the new ATB and landside facilities, our Terminal and Groundside currently meet or exceed all of the recommendations in the current Code of Practice. In addition, we have a solid corporate philosophy, which encourages improvements to facilities and amenities to align with domestic and global trends in passenger processing and customer experience. Often this philosophy has our facilities and services ahead of regulation or recommended practices. An example of this would be technological enhancements to aid travelers transiting in/out of the ATB. Another item would be assessing how many "dog accidents" occur in the hold rooms, and then considering the cost-benefit of possible solutions, just like we would any other frequent-ticket-item or repeat customer feedback.

In addition to reviewing unsolicited customer comments and feedback regarding our facility and amenities, we have a focused user group made up of members with varying levels of accessibility from within our community. We use this group as a sounding board when considering improvements to facilities, new construction, and services. Many amenities or services already exist on our campus thanks to this input, and thus we find ourselves meeting our community's expectations and far ahead of the Code of Practice.

Under subsection 170(1) the Canadian Transportation Agency may make regulations to eliminate undue obstacles in Canada's federal transportation system. For example, the agency may regulate:

- Design, construction, or modification of facilities and equipment
- Signage
- Communication of information for persons with disabilities

Although these hard facility items are important in Canada's federal transportation system, on a broader level, they are important in all buildings serving the public. As such, they really belong in a federal or provincial code to ensure there is no perceived discrimination for a user with the same level of accessibility in any genre of public building; regardless of transport, retail, recreation, etc.

As stated previously, we currently meet or exceed CTA's expectations however; there is always room for improvements. These are current trends in air terminals and other public spaces worldwide, which are not regulated but simply offered as another asset to improving the customer's experience. None of these items are regulated, yet many augment the customer experience regardless of age or ability. Illuminated wayfinding floor signage:

- Indoor Pet Relief Area
- Mobile phone apps to convey information and services
- Infant nursing
- Use of various coloured lights
- Incorporating hearing loops
- Restructuring flooring to replace carpet with tiles

Should these regulations come into effect, it could be years before we feel the impacts. Nevertheless, WAA has already responsibly chosen to provide exceptional facilities and services to our community in a fiscally prudent manner. Based on customer feedback, the guidelines as they exist today are meeting the needs of persons with disabilities. There's no demand from the public for improved accessibility.

These sections of the guide are problematic:

- Section 2.2.1, may cause us to mix commercial vehicles with public vehicles by forcing us to provide spaces near the doors on the commercial curb. We should be strongly opposed to this on the basis that it prevents us from moving to a controlled access commercial curb in the future.

- Section 2.3.2, would require us to find solutions for passengers waiting in queues. Since the queues are caused by air carriers and agencies, this burden should not fall to facility operators, but rather to the entity causing the queue.
- Section 2.5.1, pet relief area - this would cause substantial costs when many other options exist.
- Section 2.7.1 and 2.7.3, ground transportation service providers, this one is particularly concerning. There's no reason why WAA should have to compel the Hilton to provide accessible transportation to/from the airport. Same for fishing lodges and other chartered operations. Pre-arranged ground transportation agreements should be outside of the scope of the CTA. The customer has made private travel arrangements. The CTA's guidelines would also force WAA to act as an agent to find pre-arranged transportation for persons with disabilities. This should be limited in scope to on-demand service providers.

Consideration should be given for aligning disability standards for terminals with U.S. and international ones. For example, all self-serve kiosk manufacturers comply with ADA requirements. However, many vendors will simply not produce a product that meets Canadian requirements unless they're the same or very similar.

Other items that are of concern:

- "the Agency is considering a requirement for carriers and terminals to obtain the Agency's approval for planned acquisitions of new equipment and major retrofits as well as for the construction of terminals and major renovations which would reasonably be expected to impact access by persons with disabilities." In short, gaining any kind of additional government or agency approval will add time and costs to project durations.
- Ensuring that persons with disabilities are provided with the seating that best meets their needs." Is there a special kind of seating that we may need to install? And if so how many would be required per gate?
- The needs of persons with physical, sensory or cognitive disabilities are to be included at the planning and design stage of projects including renovations and new construction, rather than after a project has been completed. The Agency is of the view that it is important to consult with persons knowledgeable in disability issues. Likely, we would engage architectural firms that have an 'expert' in this area but nevertheless this will add to the cost of all renovations and fit-ups.