



September 16, 2016

Canadian Transportation Agency  
15 Eddy Street  
Gatineau, QC  
K1A 0N9

Subject: Response to Regulatory Modernization Initiative (Code of Practice, Passenger Terminal Accessibility), dated July 29, 2016

Canadian Transportation Agency,

On behalf of the Canadian Airports Council's (CAC) members, we wish to thank the Canadian Transportation Agency (CTA) for the opportunity to consult on the Agency's Regulatory Modernization Initiative and for the opportunity to provide comments.

The comments provided as Attachment A, focus solely on the Regulatory Modernization Initiative - Code of Practice, Passenger Terminal Accessibility document and were provided by several of CAC's National Airports System (NAS) members. Members were asked to provide comments on the sections in the document where The Agency is considering incorporating the existing prescriptive standards in the Terminal Code of Practice into proposed regulations. Some of the other attachments also address the broader CTA Regulatory Modernization Initiative.

In principal, CAC's members want to comply in accordance with the current technical standards included in the Code of Practice, Passenger Terminal Accessibility document, and the eventual regulations that result from these consultations. However, from a practical perspective, some airports and in particular small airports, have limited resources, terminal space and funds available to incorporate all of the proposed changes.

Airports are very familiar with the standards stipulated in this Code of Practice and endeavor to meet the requirements and provide similar and appropriate services for all passengers. In many cases, airports already meet the requirements specified in these standards. However, based on the limitations previously stated, should the CTA decide to move towards regulations in certain areas this will present significant challenges for some airports.

An additional challenge for NAS airports is they are not permitted access to Airports Capital Assistance Program (ACAP) funding, the Building Canada Fund, or other funding programs for the implementation of facilities and services that will result from regulations being imposed on them by the CTA. In addition, such funding for these eventual regulations, for the most part, would not have been included in airport's capital planning and budgets.

CAC's members also expressed concern regarding the Agency's intent to regulate and seek pre-approval of the design, construction or modification of terminal facilities and/or equipment. Airports are subject to the National Building Code and believe complying with this process, as well as obtaining the necessary building permit(s) and complying with other local requirements, adequately address this issue.

We are confident that a reasonable outcome can be achieved regarding the CTA's Regulatory Modernization Initiative and its application to Passenger Terminal Accessibility, and we look forward to working towards the next step in this process with the Canadian Transportation Agency.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Harvey". The signature is stylized and cursive.

Wayne Harvey  
*Vice President, Operational, Technical and Regulatory Affairs*  
*Canadian Airports Council*

Attachments:

- CAC Letter Regulatory Modernization Initiative – Attachment A (members comments)
- Letter #3252883890-54298-20287-190-96 (Ottawa International Airport Authority)
- Final Response to CAC-Code Of Practice-PAX Terminal Accessibility (Halifax International Airport Authority)
- Final DRAFT Response from PGAA Accessibility at Airports - discussion paper and questions (Prince George Airport Authority)
- Response to the CTA Accessible Transportation Discussion Paper for Regulatory Modernization - 2016-09-15 (Greater Toronto Airport Authority)