



Canadian Air Transport
Security Authority

Administration canadienne
de la sûreté du transport aérien

99 Bank Street
6th floor
Ottawa, Ontario
K1P 6B9

99, rue Bank
6^e étage
Ottawa (Ontario)
K1P 6B9

Unclassified

VIA EMAIL

July 6, 2023

Canadian Transportation Agency
Ottawa ON K1A 0N9

**RE: Request for exemption from paragraph 235(1) of the Accessible
Transportation for Persons with Disabilities Regulations (ATPDR)**

Accessibility and equal service for all Canadians is a priority for the Canadian Air Transport Security Authority (CATSA), and we are committed to eliminating travel barriers for passengers with disabilities. To this end, CATSA has taken a number of steps to improve accessibility for passengers and is continuing to do so through our Accessibility Plan. Making signage information more accessible is one of the key priorities for this year.

When the requirements around tactile signage came into place in June 2021, CATSA assessed the specifications and looked at how we could best address the unique needs of passengers with vision loss. Unfortunately, because CATSA's regulatory signage contains a lot of information, changing every sign into tactile format would create challenges for those passengers. First, many of the signs would be too high and large for passengers to read. Second, airport configurations differ from city to city, which makes it difficult for passengers with vision loss to know where to find relevant signage at each security screening checkpoint.

To address these challenges, CATSA has developed an alternative approach to conveying regulatory signage information to passengers with vision loss in a tactile format. This approach involves the use of a tactile booklet, which presents all regulatory signage information displayed at the checkpoint in a single point of reference for passengers to read. It includes large print, raised print and braille versions of each regulatory sign. Passengers may also choose to have the information read to them before entering the checkpoint. A copy of a prototype was shared with the CTA in February 2023.



In developing this approach, CATSA consulted with representatives from the Canadian National Institute for the Blind, who worked with our Communications team to refine the concept and develop the prototype. CATSA also consulted with Accessibility Standards Canada, the Canada Border Services Agency (CBSA) and Treasury Board of Canada Secretariat. All considered this alternative a positive advancement in quickly and easily providing regulatory information to those with vision loss.

Further, an update was recently released to the CSA standard in January 2023 (CSA/ASC B651-23), where clarification has been added to Paragraph 4.6.6.1 relating to tactile signs. Under Note 5 to the paragraph in question, it is now confirmed that *“Alternative forms of communication can be considered, specifically for extensive information and guidance that might be issued by an individual enterprise or authority.”*

Based on this change, CATSA respectfully requests a permanent exemption to paragraph 235(1) of the *Accessible Transportation for Persons with Disabilities Regulations (ATPDR)*, with approval to implement the new tactile booklet as an alternative solution for regulatory signage that contains significant text. This request for exemption is supported by the stakeholders we have consulted with, including the CBSA, who supports CATSA in submitting this request.

This exemption would be in the best interest of the public, as CATSA believes that this booklet would better serve passengers with vision loss than the current regulated requirement.

Please know that representatives from CATSA are ready and able to make themselves available to further discuss the proposal, if and when requested.

We thank in advance for considering our request and look forward to hearing from you.

Sincerely,

Lisa Hamilton
Vice-President,
Corporate Services,
General Counsel and Corporate Secretary