

**Submitted by email to the Canadian Transportation Agency**

**Subject: CATSA Feedback on the Consultation Process on Phase II of the Accessible Transportation for Persons with Disabilities Regulations**

Good Afternoon,

Thank you for the opportunity to respond to the consultation on Phase II of the *Accessible Transportation for Persons with Disabilities Regulations*. CATSA is grateful to provide feedback on this important process. Under the current consultations, CATSA believes objective four, “Planning and Reporting Obligations under the *Accessible Canada Act*,” is most relevant in terms of our obligations.

CATSA reviewed proposed reporting requirements as part of the consultation process for the Regulatory Modernization Initiative (RMI) in 2018, and we have noted that the current consultation document’s reporting requirements are not as detailed as the previous draft RMI provisions. The RMI documents included details on developing accessibility plans and progress reports, which CATSA had commented on at the time.

We had also assessed the RMI process would likely require substantial changes to CATSA’s data collection system(s) for capturing required complaint information and determined that time and effort would be required to implement them. We are also looking to understand what impacts the requirements may have on CATSA’s privacy obligations, as it relates to sharing private information about individuals who submit accessibility complaints. CATSA is committed to providing a transparent reporting and planning process to remove any barriers that may exist within our screening service. Our hope is that this can be achieved in a

manner that takes into account CATSA's existing obligations and reporting capabilities.

CATSA remains open to further discussion on the implementation of these regulations and looks forward to continue to provide Canadians a barrier-free screening experience.

Sincerest regards,

Chris Manor

**(Removed)**