

November 25, 2020

Dear Marcia Jones

RE: Request for Input regarding potential delays by transportation service providers in the implementation of certain provisions of the [Accessible Transportation for Persons with Disabilities Regulations](#)

Thank you for seeking our input in the above noted matter. We understand and sympathize with the challenges that many of us are experiencing during the COVID pandemic. As you may recall, last June we recognized the challenges caused by the pandemic for certain transportation service providers and did not object to their request for an extension in complying with certain regulatory obligations. We are now being asked to consider yet another request for an extension.

At this point, we are unable to be supportive of the extension request, based in part on the fact that we do not have sufficient information/details regarding the rationale behind and/or need for an additional extension.

To help ensure a meaningful discussion pertaining this matter at our upcoming meeting we request that the following information be provided in writing to us prior to the December 4th meeting.

1. A specific explanation/rationale as to why an extension is needed
2. A detailed description of the actions taken to date to comply with the regulations
3. A plan detailing the actions and timelines that will be undertaken if an extension is granted, including but limited to establishing new deadline dates, guaranteeing no additional extensions will be requested.

As you know, it has taken many years to develop regulations regarding accessible transportation for persons with disabilities. Thus, it is imperative that we continue to move full compliance to the regulations ahead, so as travel resumes, passengers with disabilities will not be left behind. Compliance with human rights legislation is mandatory. In this regard we need assurances from transportation service providers that such compliance will be given the attention and priority it requires.

Louise Gillis, President, Canadian Council of the Blind, CCB

Corry Stuve, Alliance for the Equality of Blind Canadians, AEBC

Yvonne Peters, National Coalition of People who use Guide and Service Dogs,

Heather Walkus, Council of Canadians with Disabilities, CCD