

Submitted by email to the Canadian Transportation Agency

Subject : Feedback

Hello,

I live in Yellowknife, NWT and have a disability. Thank you for soliciting feedback.

"Their equipment may be relatively old, manufactured at a time when there were fewer, or different, technical standards for accessibility."

Please institute standards to ensure that new transportation vehicles have standards for true accessibility that they must comply with.

"1. In extending the ATPDR to small transportation providers, what modifications to regulatory requirements, if any, are needed?"

Answer: ramps to get on and off planes, accessible terminals with accessible toilets. Ensure the terminal is served by accessible transit / cabs. If ramps are only to be used upon request ensure that the carrier is prominently communicating that ramps are available, how and how far in advance you have to request them.

For extra outrage please consider that the airline chosen by the GNWT for medical travel does not have ramps, to use the one airline that does you have to pay upfront for the flight and hope the GNWT will compensate you at some point in the future. This is why we need laws that are enforced.

"2. What would be the appropriate time frame for small transportation providers to come into compliance with requirements (e.g., 1, 2, or 3 years)? Do any requirements in particular require more time?"

That would depend on the funding the federal government is providing to help these providers become compliant.

"3. Are there any special accessibility-related challenges with small operators in any mode of travel in the federal network (airlines, tourist railway companies, bus operators, ferry operators) and the terminals that serve them, particularly in remote or northern areas of Canada? What solutions would help address these challenges?"

I live in Yellowknife. None of the tourist tour buses, or the airport shuttle buses are accessible for persons with disabilities. Why the holy hell aren't all buses accessible by default?

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Should 1p1f apply to small transportation providers?

You're missing something very important. "For a support person (also known as an attendant) for a person with a disability who can demonstrate that they are non self-reliant; that is, someone who requires services in transit that the transportation provider's staff cannot provide;"

Travel doesn't begin and end at the airport doors. It includes getting to and from your ultimate destination after you leave the airport. Getting to and from the airport can be a protracted and difficult experience, if the traveller with a disability doesn't have help upon arrival they can be thrown into chaos.

1. Should the 1p1f requirement apply to transportation to and from Canada? If so, should it apply to both Canadian and international transportation providers?

Answer: Yes and Yes.

2. Achieving consistent approaches to accessibility for international air travel requires discussions and cooperation among many jurisdictions. Given this, it may not be possible to achieve the goal of completely barrier-free international travel through the CTA's regulations. What strategies -- as a complement or an alternative to changes to CTA regulations -- could be pursued to help remove barriers to Canadians with disabilities when they fly to or from other countries?

Answer: If Canada is unwilling or unable to enforce human rights standards on businesses you allow into our country then 'Canada' can absorb the cost of the extra fares and extra charges.

3. Should 1p1f apply to small transportation providers?

Of course! Persons with disabilities live in rural and northern communities too, or do you want us all to leave our homes, families and in the rare instances jobs to realize our rights?

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Accessibility Plans

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"The procurement of goods, services, and facilities (e.g., to ensure that equipment and terminals are accessible);"

"The built environment, to the extent that the built environment is a passenger aircraft, passenger train, passenger bus, passenger vessel, aerodrome passenger terminal, railway passenger station, bus passenger station, or marine passenger terminal;"

Given the failure of the National Building Code to create accessible infrastructure please ensure your regulations include barrier free accessibility for new buildings AND when renovations are done. And please mention that mere compliance with the NBCC isn't good enough.

"Other Accessibility-Related Matters

Under the ACA, transportation providers are also required to comply with planning and reporting obligations on other accessibility-related matters, such as employment. " LOL. If they discriminate by policy, if their workplaces aren't accessible what makes you think they'll suddenly want to employ us?

"Questions

When should first progress reports related to the Accessibility Plan be due?

How frequently should progress reports be required thereafter (e.g., every year or every two years)?"

Answer: Within 6 months for the first report and every year there after.

1. What should the publication requirements be?

yes to all the points.

2. Yes to all

3. Post on vehicles, buildings and any advertisements.

4. 24 hours

5. all formats. if that is a challenge they can pool their needs and have a central provider to turnaround accessible formatted documents or other simple solutions. this isn't hard.

"What modifications, if any, would be appropriate for small transportation providers? For example, additional time for preparing required documents may be appropriate."

Answer: no additional time. they're smaller, that means they have less to prepare.

Feedback: "A guide could recommend that large providers set up Feedback Committees with representatives of the disabilities community. It could suggest how often the Committee should meet (for example, once a year)."

Please ensure that any disability org that purports to speak for persons with disabilities employs persons with disabilities and actively does outreach. I wish this problem wasn't a reality, but it is.