

Submitted by email to the Canadian Transportation Agency

Subject: transportation Reg Consultation

JOHN RAE

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Dear CTA:

I am submitting the following comments, which will be inserted after the relevant question. You will note that I have not addressed every question.

John Rae

A. Apply ATPDR provisions to small transportation service providers as much as possible – with adjustments, as necessary, to reflect their unique operating realities;

Questions

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

Similar requirements unless a carrier can demonstrate undue hardship.

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?

A short phase in period sounds reasonable to me, but not more than 3 years.

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?

Fitting larger wheelchairs and scooters onboard and/or in baggage compartments may pose difficulties. It will be important for the CTA to work closely with manufacturers so that today's new reality will be taken into account when new equipment is being designed and manufactured.

B. Determine whether or not to apply the One Person, One Fare (1p1f) requirement to international travel and to small transportation service providers;

(This accommodation allows for an extra seat or seats to accommodate a guide or service dog, a support person or a disability that requires more than one seat with only one fare charged.)

Questions

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

If a passenger requires assistance on a domestic flight, it seems obvious this passenger would also require similar if not more assistance on international travel, where the time onboard can be much longer. Thus, the one person one fare provision should be extended to all Canadian carriers for both domestic and international flights within two years.

- 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?

If my understanding is correct that Canada cannot unilaterally extend this provision to other international carriers using Canadian air space, the CTA and the departments of Transport and if necessary Foreign Affairs should undertake international negotiations with the objective of extending this provision to all other carriers using Canadian air space.

2) Should 1p1f apply to small transportation providers?

Yes, unless doing so will constitute demonstrable undue hardship.

D. Establish planning and reporting obligations for transportation service providers, pursuant to the ACA.

Questions

1) How much time should transportation providers be given to prepare their initial plans once the regulations are finalized (e.g., 12, 18, or 24 months)?

12 months, with meaningful input from users with disabilities and their consumer run organizations.

2) Should the timing of publication be consistent with that required under any other federal laws, such as the Employment Equity Act?

Plans should be publicized when prepared. There is no need to wait to coincide publication with other documents.

Additional Comments:

There are no questions concerning penalties for non compliance, and these should be added.

The need for additional onboard washroom space is not addressed in these questions, and should be dealt with as new equipment is designed and manufactured.

Respectfully submitted by John Rae

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