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Canadian Transportation Agency

Consultation

Phase II of the Accessible Transportation for Persons with Disabilities Regulations (ATPDR)

National Pensioners Federation (NPF) response

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The NPF is an organization devoted entirely to promoting and pursuing the welfare and interests of aging Canadians.

We strive to:

- Promote and help establish seniors' groups across Canada
- Advocate on behalf of seniors within all levels of government
- Reach out to seniors who are lonely, isolated or at risk
- Provide programs which promote healthy, active lifestyles for seniors
- Research the ageing process and promote intervention and healthy living
- Promote Universal Health Care, Pharmacare, Home-care and Home-support
- Fight ageism and promote full public investment by seniors
- Fight for decent pensions and retirement benefits

The NPF appreciates being included in this consultation process, although aging is not a disability, many seniors have mobility issues as well as being disproportionately represented in identified disability groups.

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Regarding small transportation providers:

Allow airlines that service more remote locations with small planes the ability to apply for exemptions. Although the terminal buildings usually are in compliance the passengers must board the plane by stairs and the baggage capacity is limited. Bus or van operators, tourist rail companies and ferry services in the federal network should have one year to comply. In particularly remote areas of the country they should be able to apply for either more time or exemptions.

Regarding the one person one fare (1p1f) requirement:

The 1p1f requirement should apply to Canadian companies that operate international trips. This requirement should also apply to all trips originating in Canada. There should be an attempt to negotiate reciprocal agreements with international carriers travelling to Canada.

Small transportation providers should have to comply with 1p1f with the ability to apply for subsidies if this creates a hardship for the provider.

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Regarding emotional support animals (ESA's):

The Accessible Transportation for Persons with Disabilities (ATPDR) already requires transportation providers to accept service dogs for transport and permit them to accompany a person with a disability on board. A service dog is defined as “a dog that has been individually trained by an organization or person specializing in service dog training to perform a task to assist a person with a disability with a need that is related to their disability”.

The regulations should allow for ESA's, starting with dogs that can fit on the floor at a traveller's feet.

A medical practitioner should provide documentation that there is a need for an ESA and the dog should at least have basic obedience training.

A passenger wanting to travel with an ESA should provide 96 hours notice to verify that documentation is in order.

Regarding Planning and Reporting Obligations under the Accessible Canada Act:

Carriers should be required to prepare and publicize their communications plans within twelve months.

The carrier should publish their initial and updated accessibility plans, as well as their feedback processes and progress reports on their websites. Information

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should be provided to travellers at the time of ticket purchase. Agents should receive appropriate training in order to communicate the program to passengers and implement the policy.

Translation services should be available; if the carrier is too small to do this on their own they should have access to that service through a government agency. If a transportation provider does not currently have a website they should be granted an extension to create one.

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