



Accessible Transportation for Persons with Disabilities Regulations Temporary Exemptions Feedback

Section 4 - General information provided in alternative formats

- Unreasonable.
- Public information about transportation services/facilities (or anything else) cannot be denied to persons with disabilities. At the very least, this information must be provided in electronic, audio or Braille format upon request.

Section 8 - Providing alternate means to access information, and publication of how to access relay services;

- Unreasonable.
- Denying an individual with a disability access to their own information is unacceptable.
- At the very least, designate one staff person with a transportation department to liaison with the disabled to community and provide this information via email, phone etc.

Section 9 - Providing alternate means to access information, and publication of how to access relay services

- It is reasonable to exempt that not *every* website owned, operated and controlled meet the requirements for a Level AA, but the main homepage website should meet these requirements and also include a notice regarding the others.

Section 10 - Public announcements inside terminals

- Unreasonable.
- For individuals' safety, security and helping ensure they get to their terminal/gate in time for departure, it is essential that public announcements be made. Not doing so is not only putting people at risk, but potentially contributing to further complications, delays and situations that leave people stranded and no services to assist them.

Section 15 - Personnel Training for the Assistance of Persons with Disabilities

- It is reasonable to suspend the training of new employees in the areas of assisting persons with disabilities during the Covid-19 pandemic. However, it is vital that employees already trained in this area be available to assist the disabled community.

Section 32 - Advance Notice

- Unreasonable
- Many advance notice requests are made to enhance an individuals' independence and/or ensure their safety. Not doing so is a potential liability. The carriers must continue to make efforts to provide a service requested by a person with a disability.



Section 35 - Permitting a non-travelling person/escort to accompany a person through the security screening process

- Unreasonable.
- While not every individual with a disability requires the assistance of a security/screening escort, for some it is vital to navigate safely through an often chaotic and confusing terminal. Not providing this service is potentially putting people with disabilities' safety and dignity at risk, and/or could cause them to miss their flight/connection etc., which could leave them stranded in unfamiliar surroundings/destination and no services to assist them.

Sections 39, 81, 205 - Personal electronic device

- Reasonable.

Section 43 - On-board storage

- Unreasonable.
- These devices are extensions of an individuals' body and are essential to their mobility, safety and independence. Every effort should continue to be made to store a person's walker or manual folding wheelchair on board the aircraft or bus.

Section 57 - On-board announcements

- Unreasonable.
- Not doing so is not only putting people at risk, but potentially contributing to further complications, delays and situations that leave people stranded and no services to assist them.

Section 58 - Written confirmation of services

- Unreasonable.
- If a service is requested and approved, written confirmation is critical. Without this confirmation, if the service request is lost, there is no proof of its existence and the essential service potentially denied.

Section 59 - Retention of electronic copies

- Reasonable.

Section 75 - Tactile row markers

- Reasonable.

Section 78 - Wheelchair accessible washrooms

- Unreasonable.
- Having access to an accessible washroom is essential to any passenger. There is no alternative or compromise to this basic human need.

Section 164 - Onboard entertainment for pre-existing ferries

- Reasonable.



Section 216 – Curbside assistance for persons with disabilities

- A – unreasonable
- If an individual requires a wheelchair to manoeuvre through the terminal, it must be provided. There are no other options to this situation. Denying them a wheelchair is putting their health and safety at risk.
- B & C – reasonable.

Section 227 - Designated relief area

- Reasonable.
- Service dogs need to relieve themselves and as long as they are able to continue to do so outside the terminal without the owner being ticketed.

Further Delays

Section 11 – Automated Kiosks

- Unreasonable.
- These should have been transitioned years ago. The technology is available, further delay is unacceptable.

Section 223 - Lift, ramp or stairs — requirements

- Unreasonable.
- These should have been transitioned years ago. The design knowledge is available, further delay is unacceptable.

Section 225 – Wheelchairs

- Unreasonable.
- If an individual requires a wheelchair to manoeuvre through the terminal, it must be provided. There are no other options to this situation. Denying them a wheelchair, in proper working order with footrests and brakes, is putting their health and safety at risk. It is a potential liability.

Section 227 -Direct access from restricted area

- Reasonable.
- Service dogs need to relieve themselves and as long as they are able to continue to do so outside the terminal without the owner being ticketed.