you above everything

December 10, 2020

Scott Streiner Chair and CEO Canadian Transportation Agency 15 Eddy Street Gatineau, QC, K1A 0N9

Dear Mr. Streiner,

This letter is a follow up to our letter sent earlier this year, in which the St. John's International Airport Authority (SJIAA) respectfully requested a one-year exemption to the regulations coming into force on June 25, 2020.

The Airport Authority fully supports the CTA's Accessible Transportation for Persons with Disabilities Regulations (ATPDR) and we acknowledge and appreciate the response received from the CTA earlier this year. However, the situation has not improved for our Airport since our last letter and the COVID-19 pandemic continues to have devastating financial and operational impacts on our Airport.

The St. John's International Airport Authority respectfully requests an additional one-year exemption to the ATPDR provisions that were extended to December 31, 2020. These provisions include:

- Making websites accessible such that they meet the requirements for a Level AA conformance that are set out in the Web Content Accessibility Guidelines;
- Providing information in alternative formats;
- Developing new training programs in consultation with the community of persons with disabilities;
- Assisting persons with disabilities between the curb and the check-in for arriving passengers, and between the general public area and curb for departing passengers;
- Creating relief areas for service dogs.

The top priority at the St. John's International Airport is ensuring the safety and security of our passengers, employees and contractors. This led to restricting access to the terminal building to passengers and workers only, making masks mandatory, and enhancing cleaning and sanitizing measures around the airport.



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Due to the COVID-19 pandemic and the strict travel restrictions in Newfoundland and Labrador, 2020 passenger traffic at our airport is down approximately 74% from 2019. This has put the airport in a dire financial situation. In turn, our airport is relying on borrowed funds to maintain safe, secure operations.

Since March 2020, the Airport Authority has made significant cuts to our capital program, cancelled projects, eliminated all discretionary spending and reduced our workforce to continue operations and lower costs. As we enter the winter season, additional changes have been made including closing sections of our parking lots, taxiways, and our third runway.

Through all of this, the team at SJIAA has completed a portion of the work to be compliant with the new regulations. We have outlined the procedure for the curbside assistance program and while we have had some consultation with community groups to create a new training program, we do not have the time or financial resources to develop and deliver the program.

The Airport Authority has also made contact with our website provider to meet the Level AA conformance in the Web Content Accessibility Guidelines. The cost to meet the requirement would be minimum of \$9,375, which is not currently within our budget.

Our Infrastructure team mapped out a location for a pet relief area. However, the Airport Authority has not yet been able to complete the project due to resource requirements.

At SJIAA, we recognize and appreciate the importance of providing access for travelers with disabilities and are committed to meeting the new requirements of the ATPDR. However, because of the current situation and operating with fewer passengers and resources, we ask that safety of personnel, financial, and operational impacts are considered by the CTA.

We appreciate your time and look forward to receiving your response. Please let me know if you have any questions or require anything further.

Kind Regards,

Lisa Bragg

Lisa J. Brugg

Director, Business Development and Marketing