

# Canadian Transportation Agency

Consultation - September 30, 2016

## Input into Consultation

**From: Dorothy Macnaughton, Sault Ste. Marie, ON**

I read your discussion paper so that I would have a sense of the kind of feedback you were looking for and also to provide me with background information that would inform my comments.

I believe the timing of this consultation is important because of the Liberal government's consultation with people with disabilities about the creation of a "Canadians with Disabilities Act". It makes sense that the Canadian Transportation Agency be well prepared to adopt new, more inclusive standards and regulations for all types of transportation that will enable people with disabilities to travel as independently as possible.

I agree that the Canadian Transportation Agency must "create a single comprehensive set of accessibility regulations... which would apply to all modes of transportation under the Agency's jurisdiction i.e.: travel by air, and extra-provincial rail, ferry and bus services and to terminals located in Canada. The regulations **should** also apply to entities whose operations are integral to the federal transportation network." (copied from your Discussion Paper, with the bolded word mine)

To put it succinctly, these standardized regulations will make travel for people with disabilities seamless, easier, worry-free and enjoyable.

As stated in the Discussion Paper, I agree that "carriers and terminals **must** provide many of the same services to persons with disabilities throughout a passenger's journey – from check-in to arrival at destination." Human rights legislation in Canada and in the provinces and territories promote a commitment to the integration of services for people with disabilities, respecting the person's dignity and independence. Transportation services within federal jurisdiction must reflect these same principles.

I believe the following requirement being considered should be implemented: "terminals in all modes of federal transportation provide assistance to persons with disabilities from the curb to the check-in area when departing from a terminal and from the general public area to the curb upon arrival at a terminal."

Consulting with people with disabilities, which you have done through this process, is critical. Keep in mind that we should be consulted and actively involved in improving and enhancing accessible transportation in the future.

I live in a community (Salt Ste. Marie) where there are air travel opportunities and inter-provincial buses. We currently have no opportunity for rail

transportation, although there is a great need for such an option, particularly for people with disabilities.

The high costs of air travel, the many challenges of bus travel (cramped quarters, difficulty moving on and off buses several times during a long trip, location of bus terminals, etc.) do not allow for more comfortable travel, such as train travel would allow. In my opinion, the federal government needs to subsidize train travel in northern Ontario particularly, so that people with disabilities can travel more easily and with less stress to destinations across Canada and make connections with fewer problems.

I would like to take an opportunity to highlight some of the areas I feel should be addressed by the modernization of accessibility standards. As someone with vision loss, I have encountered positive travel experiences which made my journey easier, more pleasant and less stressful and I have also encountered negative experiences which resulted in a great deal of stress, fear and anxiety.

- It is often not clear what counter to go to for service for people with disabilities. At times, staff have been extremely helpful when they see a white cane and ensure I get to the appropriate counter and that is much appreciated. However, at times, I have stood waiting for quite some time.

- Standards for effective wayfinding methods must be employed in new facilities and when retrofitting older facilities. Something as simple as contrasting strips on stairs make a huge difference from a safety standpoint, as well as the comfort level of the person with vision loss.
- It must be realized that it is extremely difficult for people with vision loss to use automated check in devices. In future, procurement policies need to ensure devices that are purchased are fully accessible. There are best practices in many jurisdictions to draw on (e.g. <http://mandate376.standards.eu/planning-procurement/key-principles-accessible-procurement>)
- Websites must be accessible to people with vision loss who use adaptive software to enable access to information about travel schedules, fares, etc. and to allow for independent booking. User friendly websites with easy to access information benefit everyone.
- Principles of universal design must be employed when planning new transportation facilities and purchasing new equipment (e. g. new buses or trains), taking into account all disabilities.
- Training of personnel who interact with people with disabilities must be much better. Staff needs to learn about how to

treat people with disabilities in general, and also specific training for each disability. There are many great resources and specific training programs available which should be utilized.

- Mandatory verbal or braille safety and evacuation instructions must be provided to people with vision loss once the person has been seated.
- Increased availability of staff. I have experienced situations where staff weren't available to assist as sighted guides at all or there were long waits for staff to appear.
- Improved large print and braille signage
- As mentioned in the Discussion Paper, with an adjustment to allow for all modes of transportation, "Providing an orientation **to** the aircraft, **train, bus or ferry** for persons who are blind or partially sighted."
- In-flight entertainment needs to be accessible (e.g. by providing closed captioning and described video **and accessible controls to access music and movies**). As things stand, I cannot access any in-flight entertainment.

Compliance to the required standards must be enforceable. Requiring multi-year accessibility plans is a good start and will require transportation providers to begin to plan for accessibility or improve what is already in place. Self-reporting of

how the organization is meeting the standards can be problematic and, in my opinion, the standards need to be strongly enforced in order to be effective. Random inspections (by people with actual disabilities), with significant fines for non-compliance would be preferable. In order to affect systemic change, transportation organizations will need to realize accessibility planning and implementation of those plans will benefit everyone.

Dorothy Macnaughton