



## **INTRODUCTION:**

Greyhound Canada Transportation ULC (Greyhound) is committed to delivering accessible, affordable, safe and convenient transportation to all Canadians.

Greyhound is a founding member of the Intercity Bus Code of Practice launched in participation with Transport Canada in 1992. We have made investments in fleet, facilities and training throughout our network that comply with or exceed the requirements of the Code, to help ensure our passengers with accessible needs are sensitively and respectfully accommodated. We diligently pursue and resolve accessibility issues throughout our network and proactively report our findings in compliance with the Code.

We have reviewed the Canada Transportation Agency's discussion paper, and provide the following remarks regarding Greyhound's training, services and policies.

### **1. Is there mandatory standardized training for bus staff who will be interacting with persons with disabilities, similar to what is required by the Agency's Personnel Training for the Assistance of Persons with Disabilities Regulations.**

Greyhound operators and management/supervisory employees receive standardized accessibility training that takes into account the Intercity Bus Code of Practice and the Accessibility for Ontarians with Disabilities Act, 2005. Delivery of this training is tracked and refreshed on a regular basis.

From our website:

*"Greyhound Canada Transportation ULC or its designate will provide accessible customer service training on a new-hire and refresher basis to employees (including drivers and customer service agents), volunteers and others who deal with the public or other third parties on our behalf. Training will also be provided to people involved in the development of policies, plans, practices and procedures related to the provision of our goods and services.*

*Training will include:*

*An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard*

*Greyhound's plan related to the customer service standard*

*How to interact and communicate with people with various types of disabilities*

*How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person*

*How to use the equipment or devices available on-site or otherwise that may help with providing goods or services to people with disabilities. These include: Wheelchair lifts on*



*accessible coaches, Scooter ramps and the safe storage of wheelchairs, scooters and other mobility aids.*

*What to do if a person with a disability is having difficulty in accessing Greyhound's goods and services*

*Staff will also be trained when changes are made to our accessible customer service plan."*

## **2. Any safety or regulatory barriers which would prevent passengers from remaining in their own mobility aids during travel?**

Passengers are able to remain in their wheelchairs during their travel, providing the combined weight of the wheelchair and passenger do not exceed 600 lbs., the maximum safe weight allowance for the wheelchair lifts attached to our coaches.

Scooter passengers may not remain in their devices while in travel because of safety concerns:

- Scooter sizes and weights are not standardized and frequently exceed the dimensions and maximum weight capacity of the wheelchair lifts
- Scooters do not have appropriate attachment areas for the securement straps (wheel axles covered by fibreglass; seat posts not strong enough)
- Scooters frequently do not have seatbelts and/or are not compatible with the coach's wheelchair seatbelts
- The passenger risks hitting their head and torso on the scooter's steering mechanism if the coach needs to stop suddenly.

For scooter passengers who are able to climb the steps up and down from the coach, Greyhound provides scooter ramps in order to safely stow the scooter under the coach during travel.

From our website:

*"Personal Mobility Scooters:*

*Greyhound Canada is proud to welcome eligible scooter passengers using a personal mobility scooter at major company locations and will accept their scooter as a baggage item, to be carried in the baggage compartment under the coach using a provided Greyhound Canada portable scooter ramp.*

***No fees will be charged to carry the scooter as baggage, and the scooter will not count towards excess baggage.***

*For safety reasons, on the recommendation of Transport Canada, scooters may not be placed on wheelchair lifts or secured in the passenger area of the coach. Eligible scooter passengers may not sit on their scooter in the passenger area of the coach at any time.*



*Definitions:*

*Eligible scooter passenger: A passenger who is able to climb the stairs of the coach without assistance. Passengers who cannot climb the stairs of the coach on their own must travel with a wheelchair and request a wheelchair-accessible coach through Greyhound Canada Accessible Travel Office at 1-800-752-4841.*

*A Personal mobility scooter (scooter) that can be accommodated by Greyhound Canada is defined as follows:*

*Able to collapse or be disassembled in order to fit in the coach's baggage compartment, to the following maximum dimensions:*

*Width: 56" or 142.2 cm*

*Height: 36" or 91.4 cm*

*Length: 96" or 243.8 cm*

*Maximum weight permitted: 600 lbs. or 272 kg*

*Booking a Scooter Trip:*

*In order to book a trip, eligible scooter passengers must contact Greyhound Canada Travel Assist Office at 1-800-752-4841 and request a scooter accessible trip.*

*48-Hours Advance Notice:*

*Passengers must call at least 48 hours in advance for all scooter ramp reservations.*

*At the time of booking, eligible scooter passengers must:*

*Declare their intention to transport a personal mobility scooter*

*Declare their ability to climb the stairs of the coach without assistance*

*Declare the weight of their scooter does not exceed 600 lbs (272 kg) and that the dimensions of their scooter when collapsed for traveling do not exceed the maximum dimensions as follows:*

*Width: 56" or 142.2 cm, Height: 36" or 91.4 cm, Length: 96" or 243.8 cm*

*Loading Procedures:*

*At time of loading, the scooter must be:*

*Collapsed or disassembled by passenger or passenger's assistant*

*Battery disconnected, if appropriate*

*Loaded and unloaded by a passenger-provided assistant or Greyhound Canada employee at both origin and destination point at any location using a Greyhound Canada scooter ramp."*



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**3. Do you have a policy for ensuring the accessibility of new construction or renovations at your terminal facilities?**

Greyhound follows the Accessibility for Ontarians with Disabilities Act (AODA) regarding new construction and renovations. Generally speaking, Greyhound will provide an accessible path from a car parking area or transit bus stop to the building. Once in the building, the accessible features will include washrooms and all counters and fixtures. This would include a drinking fountain, pay phones, vending machines, seating units and similar fixtures or equipment.

From our website:

*"Design of Public Spaces*

*Greyhound Canada will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include:*

*Recreational trails/beach access routes*

*Outdoor public eating areas like rest stops or picnic areas*

*Outdoor play spaces, like playgrounds in provincial parks and local communities*

*Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals*

*Accessible off street parking*

*Service-related elements like service counters, fixed queuing lines and waiting areas*

*Greyhound Canada will put the following procedures in place to prevent service disruptions to its accessible parts of its public spaces.*

- Planned maintenance of elevators, escalators, ramps, accessible washrooms or other accessible features will be posted at least one week in advance of and during the maintenance*
- Information posters will include information on alternate access or services, if available"*

**4. Do you have a policy on mobility aids with batteries?**

Wet batteries are accepted if they are on wheelchairs.

We request that batteries on scooters (freight) be disconnected, if appropriate.



**5. Describe your policy on alternative transportation e.g. the provision of an accessible taxi in the event you cannot accommodate a passenger with a disability on your equipment.**

Greyhound requires 48 hours notice for accessible reservations, but will accommodate reservations received after that time where possible.

Upon receipt of the accessible reservation, Greyhound will assign a wheelchair accessible bus or scooter ramps as appropriate.

In the event of a breakdown or other equipment issue after an accessible reservation has been confirmed, Greyhound's policy is as follows:

- Replace the disabled coach with another wheelchair accessible coach, if available;
- Offer the passenger the opportunity to travel on the next schedule; or,
- Rent a wheelchair accessible taxi if neither of the above options will work.

**6. Recognizing the range of pick-up and drop-off locations for inter-city bus routes, please provide your views on what scope the proposed regulations should encompass (for example, dedicated bus terminals only?).**

Greyhound believes this should apply only to terminal locations that are 100% bus operations. This should not include locations where bus service is a secondary business.

**7. How do you ensure that persons using service animals can access a relieving area (indoor or outdoor) of your terminal?**

To date this has rarely come up and we need to more deeply address this issue. Our experience has been that the passengers take the common sense approach and find a location outdoors where their service animal may relieve itself.

**8. How do you ensure assistance for persons with disabilities from drop-off to check-in, boarding/de-boarding, wheelchair assistance, guiding assistance for passengers with visual impairments, and assistance with luggage?**

Drivers and customer service staff are trained to provide these services to passengers with a disability.



**9. Do you have a policy for fares charged to persons with disabilities for extra seating in order to accommodate their disability (e.g. to travel with an attendant or a large guide dog or because of a fused leg). For example, do you offer free travel for attendants or a reduced fare?**

**Greyhound does not charge extra for passengers with a disability regardless of their mobility needs. Personal Care Attendants travel free.**

From our website:

*“On request, Greyhound will provide a personal care attendant with a traveling ticket to be used by this attendant accompanying a person with a disability on the scheduled route for no extra charge.*

*Greyhound will accept the determination made by or on behalf of a person with a disability that the person does not require a personal care attendant during travel. However, a person wishing to travel with a personal care attendant must provide a letter from a health care professional, or a disability travel card issued by a recognized organization representing consumers with disabilities which uses a health care professional in assessing that a person cannot travel independently.*

*Greyhound will acknowledge its acceptance that a person requires a personal care attendant by issuing an entitlement card. To fill out an entitlement card before your day of travel, please contact Greyhound Canada Accessible Travel Office at 1-800-752-4841. This acknowledgement can then be used by the person for any future bus travel on scheduled services with any operator covered by this Code.*

*A person with a disability who requires a personal care attendant when traveling within the province of Québec must submit an application form to l'Association des propriétaires d'autobus du Québec (APAQ) to obtain the Québec Intercity Bus Service Attendant Card. This card is recognized by Greyhound within the province of Québec only, and is for the use of persons with significant and permanent disabilities.”*

In addition, Greyhound offers a Companion Fare (“Friends and Family Fare”) which provides discounts to up to 2 companions upon the purchase of an adult ticket at the regular price at least three days in advance.

**10. Should qualifying passengers with disabilities always be provided, free of charge, extra seating required to accommodate their disability?**

Greyhound’s policy is to accommodate passenger with disabilities at the same fare charged any passenger, without additional costs regardless of their accessibility needs.



**11. Should qualifying passengers with disabilities be refunded fares paid for additional seating when it is determined that there were empty seats on their particular trip?**

Greyhound does not charge passengers with a disability for additional seating.

**12. Please describe any existing policy/procedures to provide accommodation to persons with disabilities due to allergies.**

Buses and terminals are public spaces. Greyhound is not able to guarantee that allergens will not be present.

**13. What medical documentation, if any, would you require to support an individual's claim that they require an animal in order to accommodate their disability-related needs while traveling?**

Greyhound does not require that a passenger with a disability provide medical documentation to support their need to be accompanied by a service animal.

From our website:

*"Greyhound will accept one certified service animal per passenger with a disability for carriage without charge and will permit the animal, if properly harnessed, to accompany the passenger on the bus. The service animal will remain on the floor at the passenger's feet during travel.*

*The service animal is the responsibility of its owner and must be under the control of its owner at all times (i.e., leash, harness or carrier). The service animal must ride in the bus within the customer's space. Service animals may not travel in the aisle or occupy a seat. Greyhound reserves the right to refuse passage to any animal that poses a direct threat to the health and safety of other customers, Greyhound personnel or contractors.*

*Passengers should note that they are required to produce written proof to the operator that the service animal has been trained and certified by a professional service animal institution."*

**14. Which types of service animals, if any, would you not be willing to allow a person with a disability to retain with them onboard (versus carrying the animals in the cargo hold or baggage car)? Why?**

Greyhound is not able to accept miniature horses or other large animals, snakes, rats, or ferrets.



**15. Reporting, monitoring and compliance**

Please describe any significant challenges you might face in publishing:

- a. Multi-year accessibility plans; and
- b. Reports on accessibility complaints received by your organization.

Greyhound currently posts its accessibility plans on its website.

Greyhound reports accessibility complaints and their resolutions to Transport Canada within 30 days of receiving the complaint.