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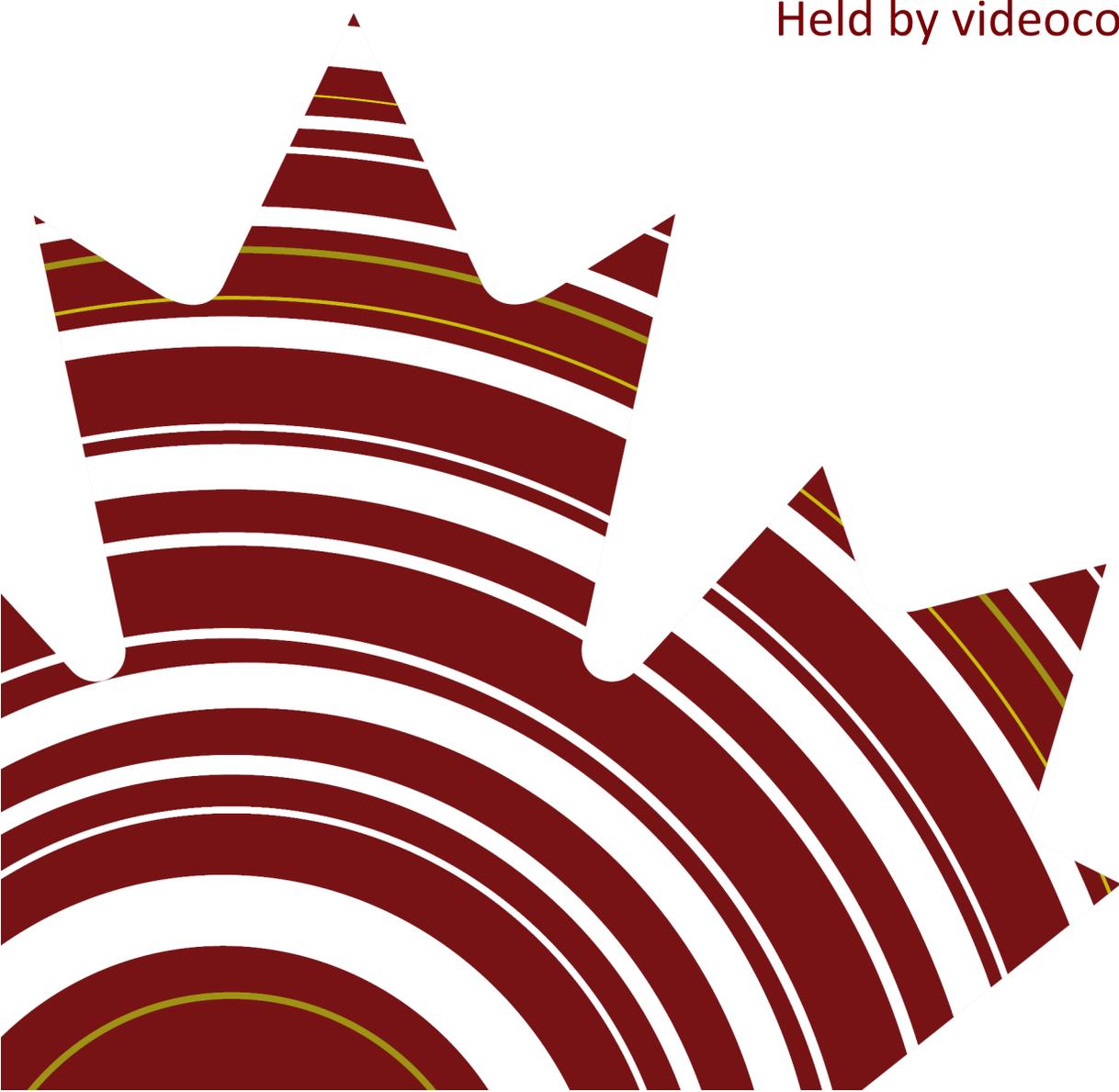
Office  
des transports  
du Canada

# Working group on ATPDR temporary exemption requests

Canadian Transportation Agency

March 23, 2021

Held by videoconference



Canada 

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# Disclaimer

## Personal statements

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## Privacy notice

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## Naming Convention

All references to speakers have been changed to first and last names for clarity and in accordance with our Inclusivity statement.

# Attendees

## Meeting host

Marcia Jones—Chief Strategy Officer

## Agency staff

Jordan Doyle

Rachael Donovan

Marcia Jones

Sonia Gangopadhyay

Susan Clarke

Glenda Nicol

Shafi Askari

Anthony Sealey

George Ross

Elysia Van Zeyl

Valérie Sicard

## Air Terminals

Wayne Harvey, Canadian Airports Council (CAC)

Joanna Zyma, Hamilton Airport

Jackie McIver, Thunder Bay Airport

Merilee Adamson, Calgary Airport Authority

Robert R. Manlig, Whitehorse Int'l Airport

Jennifer Lutzko, Saskatoon Airport

Kurush Minocher, Greater Toronto Airport Authority (GTAA)

Peter Humele, Greater Toronto Airport Authority (GTAA)

Atul Sharma, Greater Toronto Airport Authority (GTAA)

Sophie Lambert, Quebec City Airport

Tracey Hutton, Yukon Aviation

## Air Carriers

Len Corrado, Sunwing

Kelly Knutson, Air Transat

David Atkins, Air North

Kerianne Wilson, Air Canada  
Linda Ristagno, International Air Transport Association (IATA)  
Attila Ulku, International Air Transport Association (IATA)  
Jared Mikoch-Gerke, WestJet  
Sheila Duhaime, WestJet  
Olga Young, Jazz Aviation  
Erin Follet, Jazz Aviation  
Wayne Gouveia, Air Transport Association of Canada (ATAC)  
Graham Keithley, Airlines for America  
Suzanne Acton-Gervais, National Airlines Council of Canada (NACC)

## **Marine Sector**

Natalie Musseau, Marine Atlantic

## **Bus Sector**

Stevie McKeeman, Motor Coach Canada  
Mardi Schueler, Motor Coach Canada

## **Disability Rights Organizations**

Trish McAuliffe, President, National Pensioners Federation  
Jérôme Plante, Confédération des organismes de personnes handicapées du Québec (COPHAN)  
Donna Jodhan, Barrier-Free Canada  
Lui Greco, Canadian National Institute for the Blind (CNIB)  
Heather Walkus, Council of Canadians with Disabilities (CCD)  
Janet Hunt, National Coalition  
Bill Adair, Spinal Cord Injury Canada  
Corry Stuve, Alliance for the Equality of Blind Canadians  
Louise Gillis, Canadian Council of the Blind (CCB)

## **Other Gov't Observers**

Steven Winters, Transport Canada (TC)

## **Court Reporter**

Mathieu Bastien-Marcil

## **Technical support and simultaneous translation**

LMB Interpretation Systems Inc.

## Opening remarks by Marcia Jones

**Marcia Jones** : Welcome to third second working group meeting on the request for exemptions from the *Accessible Transportation for Persons with Disabilities Regulations*, ATPDR.

So we have a fair bit of ground to cover today, so I'll keep my opening remarks fairly short.

First, I just want to start by thanking everyone for their ongoing participation in this group, and your contributions and feedback are very helpful.

So we have four groups of provisions today, all of which CTA staff has triaged as C provisions, provisions for which alternatives may be somewhat more challenging in terms of a compliance perspective, but that said, this is staff's assessment and we are here today to discuss things like practical alternatives, phasing in, timelines, practical strategies for coming into compliance with these provisions.

I will again provide an overview of the provisions and what's expected and turn to the requestors for additional detail as needed to clarify during this meeting. I'll open it up to comments as needed.

And again, we've allocated time on the agenda for general commentaries for anyone who wishes to do so.

So with that, I'll pause and turn it over to LMB to give an overview of the logistics. Thank you.

**LMB** : Good afternoon, everyone, and welcome. Before we get started, we have a few instructions we would like to mention to help with the success of your meeting.

First of all, for accessibility purposes, please be sure to edit your name on Zoom to include your first name, last name and the name of your organization. Simply find your name in the list of participants at the bottom of your screen and click on the arrow next to your name to change it.

Please be sure that your microphones are muted at all times when you are not speaking. You will find the "Mute" button at the bottom left of your screen. The icon is a small microphone. You will see a red line across the microphone when you are muted.

For those participating by telephone, you can press "\*6" to mute and unmute your microphone.

To raise your hand when you would like to speak, you can press "\*9".

Participants on Zoom can raise their hand by clicking on the icon at the bottom of your screen. If you are having trouble finding the raise hand feature, you can also press "Alt Y" on your Windows computer or "Option Y" on your Mac computer.

To access the ASL services provided for this meeting, simply click on "View" at the top right of your screen and select "Gallery View". You can then hover your mouse over the video feed of ASL1 and/or ASL2 and select "Pin" by clicking on the three dots at the top right of the video.

We are also offering live simultaneous interpretation for this meeting. To access the interpretation, simply click on the small globe icon at the bottom of your screen marked "Interpretation" and select the language you would prefer to listen to.

Unfortunately, interpretation is not available for participants joining us by telephone.

Lastly, in order to enable closed captioning for this meeting, simply click on "Closed Caption" at the bottom of your screen and then "Show Subtitles".

We thank you for your participation, and I will now give the floor to Marcia Jones.

**Marcia Jones :** Thank you very much for that. And thanks, everybody, for your patience. These are unusual times and a highly accessible Zoom meeting, we hope, is meeting everyone's needs and does require some technical steps to follow, so thank you.

I want to recap to everybody to please include who you are representing beside your name in Zoom so that others are able to easily identify who is participating.

And with that, I'll give the list of participants at the table today. Again, I won't do a roll call.

I was actually just on a meeting where there was a roll call, and it took 15 or 20 minutes to get through that on Zoom. It seems to take longer, so I'll just identify the names.

So from air terminals, we have Canadian Airports Council (CAC), Hamilton Airport, Thunder Bay Airport, Calgary Airport Authority, Whitehorse International Airport, Saskatoon Airport, GTAA – that's Greater Toronto Airport Authority – Quebec City Airport.

From air carriers, we have Sunwing, Air Transat, Air North, Air Canada, IATA, WestJet, Jazz Aviation, ATAC, Airlines for America, NACC.

From marine sector, we have Marine Atlantic.

And from the bus sector, Motor Coach Canada.

From disability rights organizations, we have National Pensioners Federation, COPHAN, Barrier Free Canada, CNIB, CCD, National Coalition, Spinal Cord Injury Canada, Alliance for the Equality of Blind Canadians, and CCB.

As well, there's a number of Agency officials here today, so Sonia Gangopadhyay, who's the Director of the Centre of expertise for Accessible Transportation, CEAT.

Also with CEAT, Susan Clarke and Glenda Nicol as well as Shafi Askari, Anthony Sealey and George Ross.

From our legal services, Elysia Van Zeyl. From our Dispute Resolution Directorate, Valérie Sicard. And from Tariffs, Jordan Doyle, and our CMED group, Rachael Donovan.

Finally, from Transport Canada, we have Steven Winters.

So I'll just open up the agenda. So the first item on the agenda is an open discussion, so this is an opportunity for anyone at the table to provide any general updates, input or feedback further to the last two meetings.

So I'll open the floor up now.

# Continuation of discussions regarding group C provisions

**Glenda Nicol :** I have one raised hand from Air Transat.

**Marcia Jones :** Thank you.

**Kelly Knutson :** Thank you.

Good afternoon, everyone. I'm happy, once again, that we have this opportunity to clarify things and get together today.

I just have a question in regards to provision 75 that we discussed in the first meeting. In reviewing it with our operations team, we had additional questions, and I'm happy to see we received the transcripts from the first meeting, and I verified to see if there was anything missing that was in the transcript and I still have the same ambiguity.

It was mentioned when we discussed provisions 75 and 77 at the same time that they didn't apply to pre-existing aircraft. However, when we read through the regulations, we don't see reference to provision 75 when we look at the exemptions for pre-existing aircraft. So we're just wondering if there could be a clarification on that point for provision 75.

**Marcia Jones :** Okay, thanks for that. And just to clarify, your question is that – I'm just pulling up my notes from the last meeting. Your question is that it's not clear in the provision itself that the requirements only apply to pre-existing aircraft?

**Kelly Knutson :** Exactly. In regards to provision 75.

**Marcia Jones :** Okay. Just let me take a quick look here. I'll have to just double-check. There may be others on the team that can point you to the right provision, but just a sec.

**Glenda Nicol :** Hi, it's Glenda Nicol here with the CTA. Subsection 66(1) sets out :

“ ... the provisions of this Division, except sections 72, 73, 76 and 81, do not apply to a pre-existing aircraft.” (As read)

So that leaves out section 75, and was it 78?

**Kelly Knutson :** Okay, thank you.

**Marcia Jones :** Thank you, Glenda. That’s very helpful.

Are there any other questions, Kelly? Does that answer your question?

**Kelly Knutson :** Yes, I believe so. Thank you very much.

**Marcia Jones :** Okay. Any other questions from anyone at the table?

**Glenda Nicol :** I see no other raised hands at this time.

**Marcia Jones :** Okay. Thanks, everybody.

So we will turn to the first item on the agenda, so just give me a minute to pull up my notes.

I’ve been told that when I find my papers it’s very distracting and loud, so I’m trying to be better about muting when I do that.

Okay. So the first item is training requirements. So I’ll give a bit of an overview of these provisions and I’d also like to recap some of the distinctions between these provisions as well as the PTR, *Personnel Training Regulations*, which have been around for a while.

So these provisions, sections 15 to 23 of the ATPDR, identify which personnel are required to receive training, what that training must include, and they require that transportation service providers consult persons with disabilities in the development of each training program and the principal teaching methods.

In addition, the training provisions identify specific requirements for personnel who provide physical assistance, handle mobility aids, or use or assist with special equipment.

The training provisions also set out the timing of initial training and refresher training, and require that all untrained personnel be supervised, under the direct supervision of a person who has completed that training.

The ATPDR training provisions further require transportation service providers to inform members of their personnel of new policies, procedures or technology with respect to persons with disabilities that are relevant to the requirements of their functions as soon as feasible.

As well, the training provisions set out other requirements, such as information that must be included in the training program; making sure the training program is available for inspection by the CTA; and information about a training program must be made available to a person who requests it.

So in terms of how these provisions differ from the long-standing *Personnel Training Regulations* training requirements, there are a few areas. So first it's important to note that many of these requirements do reflect existing requirements from the *Personnel Training Regulations*. So, for example, the requirements set out in section 17 on physical assistance; 18, handling mobility aids; and 19, using or assisting with special equipment of the ATPDR largely reflect the existing requirements in sections 5, 6, and 7 of the PTR.

Some new requirements are notably consulting persons with disabilities in the development of each training program, and the principal teaching methods; details regarding the contents of training; and the supervision of untrained personnel. In addition, while the PTR required that new information on procedures and services offered, or any specific technologies introduced by the carrier be incorporated into a training program at the earliest opportunity, the ATPDR now reflects this requirement and also requires that transportation service providers inform personnel of that new information as soon as feasible.

Similarly, while section 9 of the PTR required carriers and terminal operators to ensure all employees and contractors received periodic refresher training, section 21 of the ATPDR reflects this requirement but specifies every three years.

So this is a fair bit of information for everyone at the table, but I thought it would be helpful just to identify what's long-standing and what's new.

So a number of organizations have requested temporary exemption from this provision : Canadian Airports Council; Calgary Airport Authority; Quebec City Airport; Thunder Bay Airport; St. John's Airport Authority; Prince George Airport Authority; IATA; NACC; Sunwing; Air Transat; Air Canada; Jazz; Motor Coach Canada, and Marine Atlantic. The timeframes for the delay generally range from six months to one year. The reasons being : layoffs; difficulty retaining service providers to help develop a curriculum; difficulty delivering training with personnel not being onsite: and just generally the impact of COVID-19 on finances and operations.

So I think the first question that I'll ask is whether transportation service providers have any suggested alternatives or approaches to meet these requirements. We do have a couple of thoughts but first we'll turn it over to you.

**Glenda Nicol :** I have one raised hand from Kerianne Wilson with Air Canada.

**Marcia Jones :** Thanks.

Please go ahead, Kerianne.

**Kerianne Wilson :** Thanks, Marcia, and thanks to everyone. Glad to be on the call with everyone as per usual.

One thing I just wanted to make sure is clear, and I'm sure – I am confident I speak for everyone who's requested an extension but I will, like, make it clear that I am only speaking of absolute knowledge of what Air Canada has done.

We have communicated all the changes under the ATPDR to our staff, to everyone impacted. It's been done through the use of bulletins, of course. It's been done through revisions of policies, procedures. So certainly, the delay to delivering the revised, revamped training in no way impacts the delivery of the services required under the ATPDR. So I wanted that to just be very clear.

In no way does it mean that we're not providing the services; we are required by law, and obviously will do.

Oh, Erin – Erin from Jazz, her raising hand feature is not working, just FYI.

Anyway, so I hope that that's an alternative that the Agency has considered. It's in keeping with the obligation to communicate changes as soon as possible and to incorporate them into the training as soon as possible, as soon as reasonable. But, certainly, that's a tried and tested way of implementing change, through briefings, through questions. So that is certainly the best solution I can think of and it's the one that Air Canada has used.

**Marcia Jones :** Okay, thank you for that suggestion. That's helpful.

Are there any other comments?

**Glenda Nicol :** Erin Follet is wanting to speak from Jazz, I think.

**Erin Follet :** Hi, thank you. Yes, it's Erin Follet from Jazz. And all I can get is the clapping hand feature. I keep trying that, but it doesn't get noticed, so something's not working.

Yeah, thank you again. I've really enjoyed being on these calls, and I think some of the questions that have come around training really are on – just on clarification. As you've already reiterated and as Kerianne just mentioned, we have been training our – the required people. It's been long-standing. We're certainly have not been asking for an extension or exemption on waiting to train our individuals. It has been ongoing.

As Kerianne mentioned, it's – certainly from a Jazz perspective, it's been about creating and developing a new program, which has been developed in consultation, and getting that – the new program out for everybody. And it takes about a year for crew members to train as they come through training, but we have continually trained our crew members for the long-standing requirements. Our flight attendants, and the same as our airports, they have the training – they have always had the training. So the – from a Jazz perspective, the request is really just about the – you know, the new program, although it has been launched. And the new information per Kerianne, we – any new information, it gets put out in bulletins and gets incorporated into the training program in due course. But they have to – they are required to review the bulletins as any new information comes forward.

So it's really more – I think there was question around – or concern around we're asking to wait to train the people. I think that that's not it. It's more about the development of a new program in general.

**Marcia Jones :** Okay, thank you. So the – if I understand correctly, it's really about, like, updating the training program to reflect the new elements of the ATPDR; however, those elements are being relayed through other means than training right now?

**Erin Follet :** The elements have already been there. We've met and we've been audited on our programs over the years, and so we do meet the elements. It's – as you mentioned, the new pieces to it are really about consulting, supervising, and any new information that comes along to make it into the programs, which it already has.

So I think there was – when we looked at the exemptions that came out, and my apologies if I'm using the wrong terminology, but that came out until the end of December last year, the wording in that was specifically about developing a new – developing programs, which we already had in place. We just developed new ones in consultation.

I'm not sure if I've answered your question, but really, all of the new information has already gone out there and everybody's trained, and so I want people to understand that the training has happened, and it's happened for many years. It's just about developing the new and improved programs.

**Marcia Jones :** Okay. Well, I mean --

**Erin Follet :** Kerianne, have I missed anything there or misspoke? I know we're a little bit different from you, but we're following I think similar approaches.

**Kerianne Wilson :** Yeah, if I can just clarify, Marcia that, of course, any new elements, any new obligations under ATPDR have definitely been communicated, and that's through bulletins and advisories and briefings. And then there is the separate question of revamping the training to take into account all of those obligations and the consultation with persons of disabilities, which, of course, is an important element that we understand. And Air Canada is in a fairly unique situation in that we were able to get

a third-party service provider to create our training in consultation with persons with disabilities, but the rollout is where we have a time crunch and a resource crunch.

To Erin's point, the cycle of training takes – it's about a year before everyone comes through the training cycle. And given the number of people on leave having to come back, it's just made it an impossible endeavour to have everyone run through the training while we were also creating the training, while also revising our policies. Like, there's just been a crunch because of financial, but also, like, more of a resource perspective. But again, I'll just reiterate, all changes under ATPDR in terms of services have been communicated to all staff. That's not what's going on here.

**Marcia Jones :** Okay, thank you.

**Kerianne Wilson :** Erin, did that cover it?

**Erin Follet :** Yeah, I think that's – I think we've got everything. We're covering it, and we just – and certainly want to reiterate that we're not asking for an exemption on not – on doing the training at a later date. It's ongoing.

**Marcia Jones :** Okay. Thank you for that clarification.

**Glenda Nicol :** Marcia, we have three raised hands. First up is Joanna from Hamilton Airport, followed by Kelly with Air Transat, and then Heather Walkus with CCD.

**Marcia Jones :** Okay. Thanks.

Joanna, please go ahead.

**Joanna Zyma :** Hi there. So, again, just to reiterate what's already sort of been said on this, we, as well, have communicated the new guidelines. We've rolled out virtual training where we can. Where we need the extra time is rolling out of the hands-on training as people start to return to work and they're physically together in one building. This is where it's taking us a little longer also. So, again, similar to what's already been stated. Thank you.

**Marcia Jones :** Thank you. And it's good to hear that virtual training's being delivered where possible. I mean, you know, just want to recap and I think everyone agrees, you know, how critical training is for the personnel. I mean, that's really where problems crop up when staff, you know, aren't well trained. So, I think, you know, recognizing this is a new environment, that virtual training is certainly a good approach, and perhaps not everything can be covered virtually, but it is important.

Kelly, I think you were next.

**Kelly Knutson :** Thank you. I just wanted to give you information in terms of our position and what our delay request was specifically in regards to.

As Erin and Kerianne mentioned, all changes, every update has been communicated to everyone involved. And we are – we did have the opportunity to develop the training program in consultation. And we've trained 100 percent of our own frontline employees in terms of call centre, our flight attendants are being trained as they return to work when our operations will resume, so it's part of their training.

Our issue is really in regards to our ground handler passenger agents. We – we're taking the program that we've developed to adapt it for the ground handlers and to roll that out to all of the ground handlers. So that's where our challenge are – challenges are.

In our Canadian operations, we have a plan to resume our operations with a minimal training that will cover the necessary aspects, and we want to enhance that training over the weeks following our resumption with implementing the program that we developed after it's adapted for the ground handlers. And our main issue is with the international ground handlers. That'll take a bit longer.

So as Air Canada and Jazz mentioned, that we – we're – our training's ongoing. Our employees have been trained. It's really the new enhanced training that's just an issue with the ground handlers that we're going to be rolling out gradually is our intention.

**Marcia Jones :** Okay. Thank you. That's helpful to kind of drill down on what some of your issues are or challenges.

Heather, I think you're next.

**Heather Walkus** : Yes, thank you. I was kind of waiting until the industry got to talk because I think it's important that I hear what they say.

First, thank you, Marcia, and everyone on the call. I heard your call was half as long last week because I was not there, so hopefully it will be double because I am here today. First, I'd like to commend the industry for your dedication to training. It is not an easy thing to do, depending on the size of your Agency and the amount of contractors that also have to be trained, it's a lot and I very much respect the challenges to that.

On – how I'm viewing it is through a disability lens. And really around who around this table, the CTA table, did you contact, or third parties contact for the expertise to have, to have developed this training. One of the areas we talk about is consulting with people with disabilities. It's all through the ACA, it's everywhere these days. Every person that rolls, or taps, or runs with a guide dog down the street could be tapped to be consulted.

We look at it in the disability community as a partnership that as we make changes in society to include us, because we were excluded up until very recently, that we also need to be sitting at the table to be looking at around the content of the training. And there's no 100 percent agreement throughout our – our communities, our various intersecting communities, exactly what is the right training, or what are the right steps.

The one lens I look at it through is customer service. Every person is an individual, whether they – four people in wheelchairs come up to the desk, four people with guide or service dogs come up to the desk, we're all individuals, as are all your passengers.

So there may not be one size fits all, and it's very important within the training that people are treated as individuals and asked. Just ask people. It may have said in the training you do X, Y, and Z, but ask the person because they may have a variation to that theme.

I would like us to work together in further developing training and really looking at not a standard, but more a philosophy or guiding principles around how we develop training, because the training impacts us directly and can be harmful or not harmful. And so, I appreciate that Air Canada hired a third party. I know some of the people they spoke to to get some input. I'm a little concerned it may be a little light in some areas.

However, we're in this and as a partnership going forward, I would really like us to look at ways and means that the consumer movement people in around the CTA table can find expertise in their areas to bring to the table for you. When you say you've been audited, who audited you? How was that done? What standards are you meeting? All of those kinds of things concern us, and we'd like to be involved. Some of us a little more than others, possibly.

But there will never be a perfect training and I appreciate all the training you are doing. I just want to make sure we're all moving in the same direction so that when I go to the Toronto airport, the methods they use there are similar to the ones maybe in Prince George.

And some of these things may be economies of scale, just in terms of training. All the airports don't have to do it all individually. Maybe we can pull together groups of you to talk about some of those areas too, because there's many of us, believe it or not, who are available to be hired to do training, to help develop the training, and can bring another perspective forward to it.

And I hear Donna Jodhan's hand going up, so I know that she will probably continue in the same vein, so thank you for that. But I think we need going ahead to really consider doing it together and I appreciate all of the work that you're doing under these stressful times.

Thank you.

**Marcia Jones :** Thank you for that. Donna, I think your hand is up, so please go ahead.

**Donna Jodhan :** Geez, I feel as if Heather works for the RCMP here, but anyways. I appreciate the massive amount of work that needs to be done when it comes for training to be carried out.

There's so many pieces to this puzzle, it's just not the airports, or the airlines, or any – you know, it's everybody at this table included. And when it comes to international flights, and believe me, I've been on many of these, where the ground handlers, you know, maybe have not been totally brought into the picture, they've not been totally, you know, brought up to snuff as to what is really needed. But it's – it's not easy.

And I know before COVID hit last year I did do some work with Air Canada with their accessibility training, and I'd like to just sort of continue Heather's thought process here, is that if we could find a way to develop a suite of standards whereby, you know, training standards. If that were possible that we could do that with the aid of, you know, everybody, especially us as, you know disability rights people, to help out.

Because as Heather said, who audited you? What standards are you following? Are you out on your own or are you collaborating with others? We need to know this in order to ensure that we're all on the right track here, because if we don't you will have one airport doing one thing and an airline doing another thing. And you know, like I said, I know Air Canada did reach out to me personally and I believe the GTAA has reached out to a few people as well.

So let's just try to find a way to standardize some sort of a training program that would make it easier.

Thank you.

**Marcia Jones :** Thank you for that. And let me recap that the ATPDR does introduce a requirement that didn't exist in the *Personnel Training Regulations* to consult with persons with disabilities in the development of the training program and the teaching methods.

So I think there's some useful feedback here about, you know, in consulting – discharging that consultation obligation to connect with possibly members of this working group and making sure that training meets – meets passengers' needs.

I think I saw a hand go up, but I may have missed that.

**Glenda Nicol :** I saw Erin's hand go up, but – and it's up again, with Jazz.

**Marcia Jones :** Okay. Thank you. Erin, please go ahead.

**Erin Follet :** Sorry, now I'm trying to find the mute button. I don't know how to get the hand back down afterwards, but I'll try. Oh, thanks.

So I do have a question and I think this was sort of the overriding question. When it comes to developing the new training program, which has been developed for us and

we're rolling it out in 2021, and again, this is not new, it's just an updated program. A question regarding the regulation.

We had until the end of December to develop a new training program. I think it just would need some clarification around, what is the expectation for timelines of rolling it out? Because it does take a full year to get a crew member through their training as they come in, that's when they receive the new training, and just an understanding that it doesn't happen within a month of having the new program, it takes a year to get people through. Again, that's the new training, it's not – the training is ongoing.

And the other piece is, as far as auditing, it's been the CTA that's audited us every couple of years, every two years, I believe.

**Marcia Jones :** So I guess in answer to your question, I mean like, I agree there's a distinction between developing or updating your training program and the message you are using, which piece needs to be done in consultation with persons with disabilities, and then secondly, delivering it to staff. So you know, we're aware of that.

The provisions right now, I mean there's, you know, we're considering them right now and kind of what might happen in terms of next steps for possible further delays or conditions on those delays. So right now, I can't really answer what the timelines are because that's what we're considering. But we do – like, we do appreciate that there is a distinction between the two and that, you know, some of the social distancing challenges are also coming into play here with both sides of it.

But again, you know, recognizing how critical training is. Like, I think, you know, just like at the risk of being repetitive, everyone knows how important training is and that it's done, you know, proactively and routinely, and that it's meaningful training so that challenges don't – don't crop up with passengers.

Can I just ask of industry, if there's any consideration that's been given, you know, perhaps say in the bus or ferry industry, we haven't heard from yet, to like develop training through an association, for example? Because there's some fairly standard provisions, so say for individual, you know, bus carriers, perhaps it may not be feasible, but their staff could be trained through an association. I don't know, like, it's just a thought. I would be interested to hear any comments on that.

**Glenda Nicol** : Natalie with Marine Atlantic has raised her hand, followed by Stevie McKeeman with Motor Coach Canada.

**Marcia Jones** : Okay, thank you.

Natalie, please go ahead.

**Nathalie Musseau** : Good afternoon, everybody. Thanks, Marcia.

We have our training program in place. We're looking at making sure all of the updates are there, but we have also, as Air Canada and others have described, taken a lot of other proactive measures to make sure that our current employees are well aware of any of the ATPDR changes, including bulletins, manager-led conversations, workplace toolboxes, a new section on our intranet that is full of resources, various things that we've tried to make sure that the information is easily accessible to all of our employees and useful to them.

One of our challenges is not so much about that aspect, but the aspect of the folks – our employees who have been laid off and who have not yet been recalled to work. So we have some seasonal – would have been seasonal employees expected back into the workplace that, of course, COVID has interrupted that we have not seen since.

Now, we're hopeful that we may see them soon, but it's until they come back to the workplace, the access to them is limited for us.

On a more positive note, we have – we do have an advisory committee that is made up of both internal resources and quite a number of external persons with disabilities and advocacy groups for persons with disabilities, I know at least one of which is on the call today, but we reviewed our current training with those folks, who gave us some great feedback and some tips of things that they'd like to see, so we're in the process right now of incorporating all that in our training as well.

We have developed our training in-house and we normally deliver it in-house as well, but we are also looking at sort of changing some of the traditional in-class methodology to, you know, potentially online, potentially other mechanisms that get us around some of those social distancing factors that you had mentioned.

**Marcia Jones :** Okay. Thank you. Those are very helpful clarifications.

And Stevie, I think you're next.

**Stevie McKeeman :** Hi. Yes, thank you.

So our situation is very similar to those that have been described already. The main challenge with implementing a new training program is the lack of employees. There's no one to be trained and no administration to design and implement a new program.

Currently – I mean, we've been training for years, as many companies here have been. We have been providing our training in accordance with the – Transport Canada's Inter-City Bus Code of Practice.

So to answer your question about whether the association can help and administer this training on behalf of the industry, I don't have an answer to that, but I have started the conversation with my colleagues, so it is definitely something we'll look into.

At the very least, we will be as helpful as possible and do everything we can to help the motor coach operators get the information that they need to get the training – you know, the new training programs in place as soon as possible once there is staff to be trained and to provide the training.

**Marcia Jones :** Thanks for that. That's very helpful.

**Glenda Nicol :** We have one more raised hand with Suzanne Acton-Gervais with NAC.

**Marcia Jones :** Great, thank you.

Please go ahead.

**Suzanne Acton-Gervais :** Good afternoon, Marcia. I was wondering if the CTA would consider creating generic type very short videos in consultation with the AAC members that operators could use as training and, of course, in the context of COVID, even more so, as these would be very helpful to use remotely.

These could be used by the operators, of course, understanding that many of the SOPs, Standard Operating Procedures, and policies are very operator specific, but then that the operators, depending also on – yes. So they could further develop in order to complement that.

So I just wanted to put that forth as a possible solution as well.

**Marcia Jones :** Okay, thanks. That is an interesting solution. Thank you for raising that.

I know we do have some resources on our website, including some videos, but that's certainly something that we could take back and look at more closely, so thank you for raising that as a possibility.

**Glenda Nicol :** We have two raised hands, Sheila with WestJet and Tracy with Yukon Aviation.

**Marcia Jones :** Sheila, please go ahead.

**Sheila Duhaime :** Hi. Thank you. It's so nice to be able to participate. I'm very interested in what everyone's having to say.

So I would like to just add to what Suzanne has said that in our revised training material, we used to have some videos that were created by the CTA, I believe, and we found that they are no longer appropriate so we have removed those. And that was actually going to be a question I was going to present as well, was whether or not there would be the development of new and updated video content that would present more of the information that's required today because we would like to include that in our training. And at this point, we just do not have the staffing available to create that material ourselves, so any type of standardized video would be helpful in the presentation of our training material.

**Marcia Jones :** Okay, noted. Thank you very much.

**Sheila Duhaime :** Thank you.

**Marcia Jones :** And Tracy, I think you were next.

**Tracy Hutton :** Hi. Thank you for this call.

And I just wanted to restate what has just been said by the last couple of speakers.

There is the accessibility for all short videos on the Transportation Agency's website and I'm new to aviation so I'm just learning about this. And so these videos seem very helpful for me to learn about all the different levels of service we should be providing, but my understanding is that they're not sufficient to meet the new standards.

And with listening to some of the previous speakers about the concern over consistency, if we all develop our own training in silos and then I train people here in the Yukon different than people across the country, you're going to get a different level of service when you get on a plane here as opposed to when you get off in Vancouver or Edmonton or somewhere else, right?

And so I think it's important to try and work together and if Canada Transportation Agency is going to create a new series to incorporate the new provisions.

Thank you.

**Marcia Jones :** Okay, noted. Thank you for that.

**Glenda Nicol :** Linda with IATA has raised their hand.

**Marcia Jones :** Okay. Thank you.

**Linda Ristagno :** Thank you. And I just wanted to say a few things.

I really do support what Suzanne was saying from NAC because I think that in the short term that could be a good solution if, of course, the CTA would be able to take that on board.

We could support as well with expertise. And the reason why I'm saying this is basically, as you know, IATA already provides training. And before the pandemic, we had started a robust review of and assessment of which trainings are needed, but really worldwide. This is something that we had started in mid-2019 and then we were ready, actually, to review our trainings to issue new trainings as well when the COVID-19 then came.

And so this is – this to say it's in the guideline for IATA. It's there. It's not that we lost our focus, but it's basically that we are in the same situation as any other carrier here. We lost – we in IATA as well lost colleagues, I mean, have been let go, let's say.

But actually, if the CTA would like to take on board Suzanne suggestion, we can support with some expertise from here. Because, I mean, this was really in ours and is still a priority. As soon as we can, this is something that we want to do internationally. Because as Tracy is – was right when she was saying we need to have something that is consistent because also passengers need to understand what they have to expect from one country to the other, from one airport to the other.

So just – I just wanted to add this point. Thank you.

**Marcia Jones :** Okay. Thank you for that.

So I think, so I think what I'm hearing is just a few common challenges around, like, the content with some, kind of making sure that it meets the new requirements, and then just, like, struggling to deliver it to staff that are in different employment positions. So we'll definitely take note of this suggestion about the CTA videos. Of course, if the CTA were to do this, it would be helpful but wouldn't – like, excuse me, transportation service providers would still need to kind of meet the requirements. It would just be a point of reference. I'm sure that's clear. But I just want to emphasize that.

**Glenda Nicol :** Heather Walkus with CCD has raised their hand.

**Marcia Jones :** Okay. Thank you. Please go ahead.

**Heather Walkus :** Yeah, just quickly. I think, given the amount of wealth of information that all of you have around your training and how you're doing it, it would be really helpful if there was a repository of that information, maybe through CTA, so that all of us around the table can, can look at it, get a sense of it, be able to contact each other, make suggestions, bring, you know – just have that dialogue in between these kinds of meetings. Because there's – I, I realize some of it may be proprietary possibly, but I also think we're looking ahead in this industry. We, we're going to have to band together to recreate whatever it is we're going to create with IATA having a lot of information, Kerianne's group at Air Canada, different carriers. Why don't we share

what we can? I mean, I appreciate proprietary stuff. You paid good money for it. However, that may help us start to look at the common themes between all of the training, and some of the outliers, and looking at what those are and why they're there. Because certainly, you know, in the Yukon, working with a person in a wheelchair or with a guide dog, at, at 30, 60 below, whatever it gets in the Yukon, is very different than in sunny Vancouver. So there will be differences because of regional. But I think if we share this information in a repository through CTA, I think this can be a new direction, I guess, that we can start to rebuild the industry collectively.

And to me, training is not an event. It's a process, and it's ongoing, and it will never be perfect, and it will never meet every need. However, with the will and the support of – and inclusion of our community that the training is there for, I think we can do better than just consultation. We can talk about robust, meaningful, informed decisions at the table of decision makers. So thank you.

**Marcia Jones :** Thank you. That's a very interesting suggestion as well about a repository and looking towards rebuilding.

**Glenda Nicol :** Kerianne Wilson with Air Canada has a raised hand.

**Marcia Jones :** Thank you. Please go ahead.

**Kerianne Wilson :** Thank you. Heather, I don't want to negate your idea because I think there's a lot of value in it. I can assure you that all of our training is proprietary. It's – and that's exactly why I fully support Suzanne's suggestion to have the CTA, perhaps with IATA's expertise and assistance, create more of the training standards in short videos that are standardized. And that's where I think that the consultation with the AAEC, I can't even remember the acronym, with the members on this call is really valuable. It's – those materials, I can't even imagine the exercise that would be needed to comb through and see what we can share and what we can't.

I know it's been said many times on the calls, but, I mean, we're just, we're just so short-staffed. Like, anything like that that would require a review, like, an in-depth review of what could be shared or not, it's, it's just not possible. Not now and I can't, I can't give a timeline. But I think that the value is absolutely banding together and creating useful, standardized – more on the customer service side I think like you said, Heather. It comes

down to customer service. It comes down to dignity. And certainly, a lot of those aspects are standard.

So that's, that's kind of where I am right now. I appreciate the suggestion. I think it's, unfortunately, not the right time to, to consider it.

**Marcia Jones :** Well, thanks, everyone. I think the comments here kind of speak to the need for, you know, pooled expertise from kind of different perspectives at the table and the CTA could potentially play a bit of a facilitation role. I think it's – this discussion has been helpful in understanding some of the challenges right now. And I think, I think that covers this provision. I don't know if there's any other comments that people would like to add, anything that we've missed?

**Glenda Nicol :** I don't see any other raised hands at this time.

**Marcia Jones :** Okay. Thanks, everybody. And again, these discussions are all being relayed to the panel.

So the next provision that we have is website requirements. Oh, and I'm just seeing a note about the pooled expertise would be helpful for videos but training material will be proprietary, so we've received that message. Again, I think it's about getting expertise from, from different members of this table and, and making sure training works as intended and is effective.

Okay. So website requirements, so this is Section 9 of the ATPDR. And it provides that a transportation service provider must ensure that every website, mobile website and application that it owns, operates or controls, and that is made available to the public meets the requirements for a Level AA conformance that are set out in the Web Content Accessibility Guidelines.

So we've had a number of requests for exemption to this provision or for a delay : Canadian Airports Council, Victoria Airport Authority, Quebec City Airport, St. John's Airport, Prince George Airport, IATA, NACC, Sunwing, Air Transat, Air Canada, Jazz, and Motor Coach Canada, generally due to the impact of COVID-19 in terms of retaining contractors and just resource challenges right now.

Let me give you a little bit of background on this provision. So Section 1.2 of the Communications Code of Practice sets out standards for website accessibility. 1.2.2 reflected that where transportation service providers have a contract for the creation, maintenance and upgrading of a website, the contract should specify that the accessibility guidelines from the Worldwide Web Consortium are to be followed. And we also have published useful information on website accessibility, so this is an Agency publication which provides links to information about Web Content Accessibility Guidelines.

So that's a little bit of history to that. I mean, the provision's intended to ensure that public facing, you know, web, web content is accessible. We recognize at the CTA that taking steps to upgrade a website to the level AA WCAG standard requires some level of investment and the engagement of technical expertise. And, you know, in the context of the impact that the COVID-19 pandemic has had, that implementing the standard for an entire website may be challenging for some transportation service providers technically. That said, of course, website accessibility is a key element in respect of the overall accessibility of the federal transportation network, especially today. Not only does it allow persons to independently book their travel, but it provides necessary information regarding many aspects of a person's travel throughout the network.

So, in that context, we'd like today to hear from stakeholders about the possibility of a phased-in approach to websites meeting the requirements, so where key web pages would be prioritized, so that are more, like, basic travel information, like, things like booking as opposed to, like, investor relations statements or something. And so we'd like to know whether this is feasible. And if that option were to be considered, what are the key web pages that should be prioritized and why. We'd also like to hear from the disability community about this possibility. And if there's any other suggestions or alternatives, we would very much like to hear from people on that.

So I'll open the floor to discussion. If anyone in the industry might want to comment out of the list that I've mentioned, that would be helpful.

**Glenda Nicol :** We have a raised hand from Kerianne Wilson with Air Canada.

**Marcia Jones :** Thank you, Kerianne, for being the first to raise your hand.

**Kerianne Wilson :** No problem. Thanks, Marcia. This won't be my full comments on this I'm sure, but something I wanted to say, which you did allude to already, of course, is that working on Web accessibility is highly complex, requires contractors, resources, significant investment. So that all applies regardless of whether certain pages are prioritized or not.

It – I know we keep saying this and I feel like a broken record, but I cannot emphasize how devastating this has been on our resource side. I mean, we – you know, just a small example, we obviously had another round of layoffs in January. We lost most of our contractors in December. So, it's just a reality that is crushing us enormously right now.

You mentioned in passing certain of the essential pages, let's say, from the Agency's kind of initial assessment. From what I gather, the, the booking page is one of the most complex. So certainly, if you're looking at complexity, that, that creates, that creates a conflict, if you will.

Now, of course, we completely understand the importance of the website being accessible. So it, it's truly just – it's a bit of a bind. It, it really is. I understand Agency's proposal. I am also curious to hear from other industry groups and the disability groups. But all I can say is that it's, it's really just a matter of, of resources. More than capital expense, I would say just resources. Highly trained, highly competent people working on a million things.

And especially, like, I can't even – I, I have to just add the fact that not only has COVID reduced our resources, but it has added to the workload. The constant changes and updates to our website required to handle the COVID crisis, changes in document requirements, changing in entry requirements, making sure that customers understand what the restrictions are. I mean, there's been an incredible amount of development that's been required to handle the crisis. So, it's kind of a double whammy, if you will.

So I'm sure I'll have more to say. I'll stop there because I'm sure others have, have issues to raise.

**Marcia Jones :** Okay. That's helpful. Thank you.

Are there any other comments on this, on this provision, this exemption request from industry?

**Glenda Nicol :** Wayne Harvey with CAC has raised a hand, along with Donna Jodhan with Barrier-Free Canada, and Sheila with WestJet.

**Marcia Jones :** Okay. Thank you. Wayne, please go ahead.

**Wayne Harvey :** Thank you, Marcia. Can you hear me?

**Marcia Jones :** Yes, I can.

**Wayne Harvey :** Okay. Good. Wasn't sure.

Yeah, just to be clear, from the airport's perspective, and obviously we have different situations at different airports, and some airports have implemented these website updates, you know, the extent required. Others have started but were interrupted by the COVID situation.

But as I say, just so we're clear, what we're taking – what we're asking for an extension specifically is making the website accessible such that they meet the requirements for a level AA conformance that are set out in the Web Content Accessibility Guidelines. And this is – this request was mainly pertaining to, as mentioned earlier, it's the same thing with the airports, it's contractors and resources from a safety perspective and availability perspective because resources are pretty thin at a number of airports in this regard. A number of layoffs have occurred. And, I mean, I won't repeat what others have said, but much like the air carriers, the airports have been hit the same way. So that's the main issue with us in terms of requesting more time to, to implement these, these particular requirements.

**Marcia Jones :** Okay. Thank you for that.

Sheila, I think you were next?

**Sheila Duhaime :** Hi, thank you. Yes, I'd like to just add further to that that we're, we're in the same situation I think that many people have expressed. We've been – WestJet at least, we've released the majority of our contractors back in March or April of 2020 and have not rehired those. We have a workforce that is, you know, stretched quite thin, again, in managing the requirements of day-to-day operations, as well as

managing the constant, frequent and incredibly complex changes required under COVID management.

But in addition to that, part of the challenges with reaching that level A conformance – or double A conformance is there are several third-party sites that are also attached to our website that require dealing with external companies that are also on their own experiencing the same challenges.

So it's not simply a matter of throwing, you know, more bodies at a problem on our side. There are also additional complexities that are not always in the control of the carrier or the service provider. So just to keep that in mind as well.

**Marcia Jones :** Okay. Thank you. That's helpful to know as well about the connected sites that need to be addressed.

Donna, I believe you were next?

**Donna Jodhan :** Thank you very much. I think that website accessibility has been and continues to be a chronic problem, not just for the Transportation Agency – industry, I'm sorry, but for several other industries. And I think it's only compounded when too many organizations and entities employ contractors who really are not experts. They say, "Yeah, I'm an expert. I know what to do." But in essence, they're not. They give you websites that are not fully accessible. And then they go out and they use testing tools that are not even worth the paper that they are printed on.

And I'm sorry to say this, but recently I had an experience with a tool that was used, and it claimed that the particular website was accessible, and it wasn't. The menu could not even be accessed by people using keyboards to access the links.

So I guess what I'm trying to say is, yes, I recognize the horrendous pressure that this industry is under because of COVID, because of other things. But folks, we cannot keep putting off what needs to be done. And if you want to put it off, then, please, let us work together to develop some sort of a plan, some sort of a, you know, deadline, a proposed deadline as to when you think we could start working on this, but utilize the disabled community. Don't go out there and use contractors, please. These third party contractors will only take your money to develop websites that are not accessible and then, guess what, you've got to go and redo it all over again. And you know what, you're

going to get lawsuits against you. Not by me, I promise you, but other people will do it because they're frustrated.

So if we could find a way to work together as has been, you know, said throughout this entire suite of meetings, use our expertise, let us help you to find third party contractors who know what the heck they're doing.

**Marcia Jones :** Thank you for that, Donna. Much appreciated.

**Glenda Nicol :** We have a raised hand from Kelly with Air Transat.

**Marcia Jones :** Okay. Thank you.

Please go ahead.

**Kelly Knutson :** I just wanted to maybe bring some light to our request for a delay in regards to our web content accessibility.

We have employed – we've contracted a digital accessibility expert, and I appreciate the comments of Ms. Jodhan. I sincerely hope that we're not in a situation that our expert isn't an actual expert.

But we have contracted an expert, and we are – we meet the requirements for both our website and the app for Level A conformance, so we are confident that we're compliant with the requirements at the moment.

Our request for a delay was really in regards to being able to factor in continuous improvements, the development of a quality assurance process in order to ensure that we maintain compliance and constantly improve in general just so that we can provide that information in regards to what our delay request was really about.

**Marcia Jones :** Okay. Thank you.

So if I understand correctly, it's really the – like the continual improvements and like quality assurance piece?

**Kelly Knutson :** Exactly.

**Marcia Jones :** Okay. Thank you.

And then just to, I guess, add one other comment just sort of thinking a bit about what's been said, you know, the standard set out in the regulations is kind of like an objective standard, I guess, the WCAG standard for accessibility, so I think, you know, contractors would work towards that, but always, you know, like the Agency always supports consultation with the disability community, like user testing and things to be sure that it actually works was intended. I think that's an important safeguard.

**Glenda Nicol :** Kerianne Wilson with Air Canada has a raised hand.

**Marcia Jones :** Thank you.

Please go ahead.

**Kerianne Wilson :** Thanks, Marcia. I told you I was not done on this.

So something that I'd like to pick up, and it actually ties really well with what Kelly said and what you've said yourself, Level AA compliance, as much as it is an objective standard, the way that it can be conceptualized is that you have a certain number of criteria and you can have, you know, thousands of instances where one criteria shows up and let's say you have 1,000 images and 999 are properly identified but the 1,000th is not, you fail that criterion.

So it basically means that there's always going to be change, always going to be improvements. It's not like you reach 100 percent and then you're good, right. Anything you do to the website changes and it could affect many criteria, one criteria. But it's – I can't stress enough what Kelly said, that having the proper process is just as important, like having the time to set that up and the maturity and the understanding that it's in constant evolution.

It's not as though you achieve compliance and then you're set, you're good, nothing's going to change again. It's just not the case. And having 100 percent conformance with a standard like this where you either meet Level AA or not, it's just not – it doesn't match how web development really works.

And what's been explained to me is that in the next iteration of WCAG, they're looking at changing compliance standards so it's kind of a ranking as opposed to just you meet it or not. I think that's a really important consideration to the Agency.

**Marcia Jones :** Okay. Thank you. That's very helpful.

**Glenda Nicol :** We have a raised hand from Heather Walkus with CCD.

**Marcia Jones :** Thank you.

Please go ahead.

**Heather Walkus :** Hi. There's a lot of work being done at W3C, the World Wide Web Consortium, and there's – as Kerianne said, they're changing how they're doing business in a number of ways all the time, consistently, and certainly growing the idea of compliance being rated as opposed to yes or no. And so you can achieve different levels through your process.

And I totally agree with Kerianne, it is a process and you will never be finished being accessible or meeting a standard.

One of the things for me is I'd like to ask the industry, when you're doing – you're not – my understanding is that – especially Kerianne and WestJet. Maybe you could help me understand this.

I hear the impact of the COVID rules and what that – I mean, when I heard it, the first thing I thought was, "Oh, my God, how's the industry going to deal with this one, the hotel bookings and all of that?".

But when it comes to accessibility, I understand that the airlines are interconnected. Like at IATA, you have, what, nearly three, four hundred airlines that you represent around the world, and the systems are connected.

And when you have smaller airlines that tap into those systems that to, say, set up code shares and to set up – if I was to come in as a user, I would just see your front interface, but I don't see all the bells and wheels that go on under that and the international connections if I'm flying here and there but I'm going through one site to get there.

So I'm just wondering, too, just for my own knowledge and the knowledge in the disability community, when you are putting together accessible, when we talk about accessibility, it isn't just your front page. It's everything connected to it that also has to plug in, I guess, along the system.

Am I correct in that, Kerianne? Because you probably have a good answer.

I'm trying to understand the process so I can come back to my community to say, "Look, not just is there a resource problem, there's an international problem that everybody has to – all these computer systems must work together in order to do it right".

So I'll leave it there, and I hear Kerianne's hand went up.

**Kerianne Wilson** : Thanks, Heather.

So I think you've hit the nail on the head for at least part of it, which is that certainly the underlying systems that feed into our website affect what we can do, so I'll give a small example.

We had a very – I don't want to call it antiquated because it was such a powerful system when it was adopted, but our reservation system that we had prior to two years ago had been in effect for 30 years, so it had very little development capacity left. It was homegrown. We'd built it by ourselves. And it didn't feed in well with other systems.

So we've changed our system. We actually launched it immediately before COVID and then have really not had the chance to use it properly. As I'm sure everyone knows, you know, our volumes have been at 15 percent or something.

But yes – in a nutshell, yes, it does have an impact, certainly. It's just like website accessibility, as much as it's been around for a while, it hasn't been ubiquitous. It's not equally present in – throughout the world and so, of course, that has an impact when the systems are aligned and interconnected.

The other thing I did want to just pick up on, when you talk about the impact that COVID has had on us and hotels and the arrival restrictions, it's just a simple question of having to develop more with the same resources, right. And that's, I think, a point that can't be overestimated.

All of these new functions that we have to offer to be able to continue transporting passengers are being built in many cases in-house because we cannot afford to hire, which means that we're using the already slim internal resources to build new functions and new programs, if you will.

So I hope I've answered your question, Heather. I'm happy to discuss further offline if you'd like or now, as you wish, or maybe I'll let Sheila answer and then you can follow up with both of us.

**Heather Walkus** : Yeah, I'll have a comment with – after Sheila goes.

**Sheila Duhaime** : So I guess it's my turn.

Yeah. So similar to Kerianne, it's the same thing. It's – I mean, if you imagine a person sitting at a desk and they're doing their job and they're supposed to work an eight-hour work day and they have their normal course of business keep-the-lights-on type work that keeps them busy for eight hours a day, and then, all of a sudden, you remove everyone else, their jobs to roll over onto that one person, and it keeps pushing out timelines because they have less time to work on one specific project because they're now working on 5 or 10 or 20. So there's definitely that time consideration with that.

I know on WestJet's side of things, the reservation system that we use for WestJet air only reservations is Savor, which is a system that was developed first in 1960. And, yes, it's very old, and yes, it's been upgraded and it's continuing to be maintained and everything else, but it is the system that does feed into both of our website and – but we also have to remember that there are other systems that fed into there as well. We have a reservation system called Soft Voyage that actually rolls into the WestJet Vacations portion.

So there's multiple systems, multiple inputs, multiple outputs, and each one of those has to be looked at in isolation and as a whole.

Web content integration, content development, and, again, when you're starting to use other third-party systems as well for content; for example, even on our website we have another micro site that does our dangerous goods, that's yet another vendor.

So we're going to multiple vendors asking for multiple changes to be made and for them to be brought up to date. And, again, at each one of those organizations they're experiencing the same challenges with that one person sitting at their desk that's supposed to work an eight-hour day that now has, you know, 40 or 50 hours' worth of work per day, if they were to try and manage the workload and the requirements based off of a reduced workforce.

So although it would be of wonderful benefit for the entire world, I think if we could get everybody onto the same system and have everything aligned, it is not simple and although airlines are able to work miracles as far as connecting into different systems, every time a code share for example, or interline deal is brokered, those types of interactions take (indiscernible) take years of effort to properly function, so – and that's just in the management of booking. That's not in the management of delivery of the other rich content that's (indiscernible).

I think what I can say, from at least WestJet's perspective, is we are working. We have a concerted effort, we've been able to utilize some of the downtime where we did have some staffing in order to try and improve the site and get it to the double A conformance, but it is an ongoing, long-term, intensive effort that's required, and I don't think it will be done ever because as things are developed we have to go through and manage and maintain and continue to ensure that we are consistent. But it is a very complex development in order to get to WCAG standards.

So, I mean, I hope that provides some, you know, clarity but it's very complicated.

Thank you.

**Marcia Jones :** Thank you for that, Sheila.

And, Heather, did you want to add anything?

**Heather Walkus :** I'll wait, if there's other hands up. I've spoken quite a bit, I'll wait.

**Marcia Jones :** Okay, thank you.

**Glenda Nicol :** Corry with AEBC has his hand up.

**Marcia Jones** : Perfect, thank you.

Please go ahead.

**Corry Stuive** : Thank you, Marcia.

You know, respecting the information from industry that has been provided over the last little while, I just – I guess of all matter we have talked about over the last two and a half weeks, probably this one is going to garner the least amount of sympathy on my part.

I do appreciate it; I do understand COVID, the implications of COVID, the implication on contractors, the implication on staffing, but I think it's also important to say that, you know, website accessibility is not something that was trotted out three weeks before COVID hit, and this has been on the agenda for a long, long, long time. And I guess to some degree I'm somewhat disappointed at the levels of gain that we've realized up until the beginning of COVID, for lack of a better term.

And I do respect the fact that, you know, it's a moving target and, yes, full accessibility is difficult, if not possible to achieve. But I think we just have to keep chipping away at it. We can't stop the process. I think we need to move forward with this in some sort of capacity.

And, Marcia, to answer your question that you posed at the beginning of this discussion, you know, is sort of a makeshift solution to this practical? I would say yes, absolutely; better than nothing. I mean, if we want to focus in on the booking pages and such, great; investment relations, that can be done later.

So, I mean, if you're looking for an opinion on that I would say, yes, something is better than nothing. But I guess I just needed to chime in and say I hope we can continue to move forward on this and it's just – it's vital. I mean, that's – I guess those of us who are vision impaired and blind have the most at stake here, and that's why we're here today and probably have more comment than perhaps some of the other disability groups.

But, you know, equal access to that website is so critical and so important. And it's not like we need to develop a second or a third or a fourth website; I mean, once it's

accessible, all matter placed onto that website should be accessible. And perhaps I'm being a little over-simplistic there but I think it's important to recognize that also.

I'll leave it at that, thank you.

**Marcia Jones :** Noted. Thank you very much for your comments.

I think there's – sorry; go ahead, Glenda.

**Glenda Nicol :** Sorry, Marcia. We have a raised hand from Louise Gillis with CCB.

**Marcia Jones :** Great, thanks.

Please go ahead, Louise.

**Louise Gillis :** Yes, thank you for this great opportunity, and like all the folks with vision loss before me, I totally agree with them. We do need to continue this, and we have for quite some time realized, and it's probably 10 years at least, the websites have not been accessible in many ways.

And it's important that we try to – at least we're working at it and moving forward to get ahead in some areas. In order for us to get a booking, it's kind of a priority, I would say, to make sure that that first part is done. And just to try and continue working and proceeding somehow with it.

Corry has really summed it up there in his statement and I think that's the best that we can do at this point. I know that, hopefully, within a very short time we should be, once everyone is vaccinated, be moving forward and getting better at things.

But a little bit of improvement is better than no improvement, this is what I'm seeing, but yet we have to strive for the best. And working with us who are here at this table to bring that out, and Corry is one person who has a lot of technology behind him that can help out, and there's many others in our organizations that have a lot of technology ability to be doing some of this work, too.

So just please include us and we'll work forward to try and make the best of life as it is now.

Thank you.

**Marcia Jones** : Thank you, Louise.

And, Heather, I see your hand is up.

**Heather Walkus** : Yes, thank you.

Just I'm always looking at problem solving or figuring these things out. One of the things that a lot of people do is they look at those standards and they think, "Okay, we need an expert"; and that's true, you do.

But, also, W3C is an expert. It has probably got the best experts in the world pulled together. I could see a linkage between CTA and our partners around the table to maybe CTA work with – a number of us work with W3C all the time, for different reasons. Louise is part of the World Blind Union; has a seat there at CCB. And we've recently been on calls with Hong Kong around their work with W3C through the banking system in a number of the Asian countries. So World Blind Union is involved all over the world. But just in terms of accessibility, it would be very, very helpful if we maybe have some kind of relationship with W3C. I think they can bring a lot of knowledge, and technical expertise, and support to the industry and to us as well in our community around this issue of, how do we go ahead.

And I agree with Cory and Louise that there's nothing more frustrating than getting on a website, and you could think about someone talking to you through your computer on a blank screen and telling you what's on that website and you can't find the things, they're not there or they're not compatible. So the workaround is, of course, a phone number. Who do you call? Well, who is there to call left in the industry to call?

So there's a number of things we're going to have to do to get compliance, if that's what we're looking for. But I think and I agree, that this is probably the most important thing we are very concerned about, is accessibility to these websites. If there was – in the sensory industry, or sensory area of disability, this is key.

So for all the airports that are stuck in this position as well, it's not going to be an easy fix, it's going to take some time. But I think if we bring in some expertise and maybe do

some workshops so we all are clear what we're looking at getting done, that would be helpful, and I think W3C could be effective that way. Thanks.

**Marcia Jones :** Okay. Thank you very much for that suggestion. I guess – I guess I just want to recap a little bit of kind of what – what I guess I'm hearing, just there's a number of different perspectives at the table.

So first of all, that you know, getting this in place for a full website is highly complex and there's a lot of, like moving parts, there's other linked websites and so on. There's a bit of an enforcement piece where 100 percent compliance at all times isn't – isn't really possible and it doesn't make a lot of sense, and that it's sort of a process of like, continual improvement to make sure a website is accessible.

I think I'm hearing a bit of differing views on whether, you know, how feasible it is to phase in different websites. But you know, general agreement that this is important and needs to happen. And then of course, the importance of having, you know, expertise looking at websites, kind of over time to make sure they meet everyone's needs, you know, going forward is also very important. So I think, you know, a number of different things have been said I think, that are helpful in looking at this issue.

I guess I want to go back to a more basic question for industry about, you know, the exemption requests are you know, suggesting like a year, six months to a year. Like, what is – what's a realistic timeframe to implement this standard for websites, like for the needs of travellers?

**Glenda Nicol :** We have a raised hand from Kerianne Wilson.

**Marcia Jones :** Thank you, Kerianne. Please go ahead.

**Kerianne Wilson :** So Marcia, I hate to give a wishy washy answer, but it's – like, right now we're in the worst quarter we've had, right? Like, it's just – it's abysmal. So I think it will depend on what the Agency is considering in terms of a phased in approach, right?

If you're proposing 70 percent of the website because that covers the major customer facing things, well, then an extension of six months is helpful, but maybe not enough. If it's more of a phased – if it's more of like a progressive implementation, obviously that's

helpful and I'm making that statement in the hope that we do see a real recovery to our industry.

You know, I keep going between fear and hope in terms of what's going on with vaccines and border closures, and it's just so difficult to predict. But I'd say that like, six months to a year for a phased in approach and then – and then like a continued phased in approach, rather than you know, you do the essential things for six months to a year from now and then everything else comes into effect immediately. Like, I can see that there's something to be done here, but again, it's contingent on like, if this continues, if Air Canada continues as we are now for the next six months, well then, that six months will have not been sufficient.

And again, I'm sorry to be so vague, but that's the nature of a pandemic that has hit Canada in so many specific ways, in the Canadian industry in so many different ways. I know that Linda had something to add. Linda from IATA, in terms of the approach that was taken for web accessibility. So can I pass over la parole to Linda?

**Marcia Jones :** Sounds good. Linda, please go.

**Linda Ristagno :** Thank you. Thank you, Kerianne. Sure, of course. Yeah, actually I think that – okay, in Europe we have negotiated this EU directive. So I'll share the experience that we – we had hear, but of course I cannot commit for the members because I have to go back to them first, if of course this could be accepted by the CTA.

What we recommended was a step-by-step approach to ensure a better accessibility to websites. The reason why we did this is because making 100 percent of websites content accessible to passengers with disabilities, we realized is very long and really costly process for the reasons that have been mentioned by Heather and many, many others.

In reality, it depends really on how the websites are built and because it's – for example, Heather was mentioning that we – it can be done by IATA, actually we don't build really the websites, we build the – the standards and also how the – how certain messages should be shared between the members. So it really depends on how the websites are built and – and we realize that what can be an initial cost for a simple structure can really end up to being multiplied be five or more for more complex structures.

So one of the possibilities really could be a step by step approach, like for example, it has been implemented in the United States considering core elements. What we did in Europe is that for example, we've amended – by making some – also some investigations we realized that seven core elements represent more or less the 70 percent of the workload, which is very difficult really to change as Kerianne mentioned. Was – is the booking, or like changing a reservation, then there is the checking for the flight and so on, and so on.

But actually, if we could have the opportunity really to implement the first steps for – the first seven steps for the – two years and then stepping – really using a step-by-step approach that this is something that probably could be – could be discussed. And again, I'm not making any commitment for the members because I need to go back to them. But I realize that this is something that is – that can work, and this could be actually a feasible solution.

**Marcia Jones :** Okay. Thank you. That's – those are very interesting suggestions, and let me also just recognize, you know, the concerns of the disability community about, you know the frustration of not having an accessible website and feeling like it's taking a while. So we're really looking at practical solutions so that this can be implemented given – but in light of the current situation.

I think, Donna, you had your hand up?

**Donna Jodhan :** Yes, thank you very much. Look, I recognize that Air Canada, along with so many others, are in dire straits. But doing nothing will probably cost you a heck of a lot more in the future when you finally do decide that it is right to do something. Doing nothing is really not going to solve the problem, and I think the step-by-step approach would probably be a good starting point. At least it would show that we are all working together to try and do something. But, you know, telling us that you can't, you can't, you can't, is really not helping the situation.

And I know that there are hopes and fears, and I know that, you know, in six months things may be different. Heck, I want to travel internationally. I can't. But that doesn't mean that, that I'm not going to try and find solutions that will help me and help others as well.

So, all I'm saying, please, let us try to work together for a step-by-step approach. Don't leave it and say you can't do it because of cost. We know the costs are tremendous. We know the costs are exorbitant. But it's not an excuse really because we've been hearing the same drum beat for many, many years. You don't have the resources. You don't – and now you really don't. You see when you cry wolf what happens. You don't have the resources financially or human – human-wise. You've been telling us that for many years. Now the wolf has come to your door, but it shouldn't mean that you should be afraid to try and do something.

So I'm urging everyone at this table to please, let us sit down and try and find a step-by-step approach. And you have built it in, you know, if anything were to happen, this would be it or that would be it. I don't think that saying you can do it in six months or a year is a good enough reason. So that's just my input. Thank you.

**Marcia Jones :** Thank you for that.

Kerianne, I think you have your hand up.

**Kerianne Wilson :** I do, and thank you. I don't mean to overtake the conversation, but, Donna, I just wanted to reassure you that we are certainly not doing nothing. I, I can promise you I'm on regular calls and discussions. We are working very hard on it still with the resources we have. So, I just wanted that to be clear in case I had given the impression that we were not doing anything and were relying on having an extended extension. That, that's certainly not the case, and I, I beg your pardon if that came across that way.

**Marcia Jones :** Okay. Thanks for that. I think there's been some very good points raised on these provisions. And I feel like we've got some possible, you know, suggestions that have been, that have been floated.

I think, Sheila, you wanted to raise a last point. I guess you're not able to raise your hand. Go ahead.

**Sheila Duhaime :** Yes. Thank you. Sorry, I've been trying to get my hand to go up and it's not working. So, yeah, I was actually just going to make the same point Kerianne had, had stated that, although we're asking for a delay, we're not by any stretch of the

imagination not working on this. It's just that progress is slower than what we'd like to see.

I don't generally like to provide a lot of numbers, but I can – I'll give you an example. We have generally taken an approach of trying to address the top pages that are accessed by our guests. And out of the top 100 pages, we've reduced errors down from 800 and – more than 800 down to below 500. So, we are addressing things as quickly as possible, but, you know, and we're addressing many, many issues to try and bring about compliance. And there's some places where we're at a hundred percent and there's some places where we're not even close. But we aren't, by no means, not working on this.

So I just want to make sure that that's, that's very clear, that we are making a concerted effort, but it is a very challenging environment. It's a very – we're all very short staffed and things are going to take time. And I think that's why we are looking for an extension just to make sure that there's an understanding it is going to take that time. Thank you.

**Marcia Jones :** Okay. Thank you for those clarifications. I'm sorry your raised hand function isn't working.

Suzanne, I see you've got your hand up as well?

Suzanne, if you're speaking, you're on mute.

Okay. I don't know if we're having technical difficulties on – yes?

**Kerianne Wilson :** I, I can send her a quick message so --

**Marcia Jones :** Okay.

**Kerianne Wilson :** -- I'll let you know. Oh, she said her screen froze.

**Marcia Jones :** Oh, okay.

**Kerianne Wilson :** That's too bad.

**Marcia Jones :** Okay.

**Suzanne Acton-Gervais :** My apologies, Marcia. Can you hear me now?

**Marcia Jones :** Yes.

**Kerianne Wilson :** Yes, we can.

**Marcia Jones :** It's good, yeah.

**Suzanne Acton-Gervais :** Oh, my gosh, there's nothing more stressful than hearing go ahead and you can't, you can't press the screen. My apologies for that. My screen froze.

I just wanted to, to also add, and I realize that two of the NACC members have already spoken, but from the NACC perspective, we do want to reassure the Agency and the members of this working group that NACC member airlines have not put on the, the full breaks on their respective ATPDR projects. That was one thing that we wanted to, to make very clear. And our members will continue to work diligently on making travel accessible by air during COVID-19 and well beyond. Our members also commit towards the full implementation of the ATPDRs as soon as fiscally and operationally viably to do – viable to do so.

So, I also wanted to reiterate some of the comments that have also been raised and, and to address some of these concerns. And now I have to try and put myself back on mute. My apologies.

**Marcia Jones :** Okay. Thank you for that. And at the Agency, we certainly appreciate the comments from industry at this table about your, your commitment to meeting the ATPDR requirements.

So I think we've had a really good discussion on these provisions, and it's about time for a break. I just – before kind of breaking, I just want to see if anyone had any last comments on the training provisions – sorry, not the training provisions, the website provisions. That's a sign that I need a break because I'm mixing things up.

**Glenda Nicol :** Heather raised —

**Marcia Jones :** Sorry, Glenda.

**Heather Walkus :** Yeah, just, just quickly. I, I just need to reiterate to industry, the people sitting at this table, we are volunteers. Everything about everything in our society is coming at us. What do you want to do? How do you want to do it? These nine hours our people are sitting in these meetings are donated time. Everything we do in our research, in our work, is all done by people with disabilities, trying to make a better world. And I, I just hope you will appreciate that.

You talk about lack of resources, 90 percent of the people in our community are unemployed living below the poverty line. There are more people employed to look after us than there are of us employed. There's something wrong here, and I, I can't stress that enough for you to consider on your coffee break, what it's like to work 40 and 60-hour weeks to try to make a change in our society. And there's hundreds and thousands of us doing it every day, and have for, a lot of us, our whole lives. So be aware too that we have no resources. We have also, have been feeling this crunch of being excluded from society for a very, very long time. So we definitely have the empathy for you, how you are feeling with this crunch, and with lack of resources, and what you are attempting to do. So we do appreciate it, but we've been doing it a long time ourselves. So thank you.

**Marcia Jones :** Thank you for that. And certainly, I mean, the, the disability community has – you know, I've already stated this, but has been severely impacted by COVID-19 and that's an important point that probably can't be repeated enough. So, appreciate you reminding us all of that, Heather. Thank you.

Are there any other comments?

**Glenda Nicol :** I see no other raised hands at this time.

**Marcia Jones :** Okay. Thank you, Glenda. So thanks again, everyone, for your comments and feedback on those provisions. It's been a good discussion so far. We'll break for 10 minutes, so that would take us to just after 3, so say 3:02. So we'll see everyone back here at 3:02. Thanks again.

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Upon recessing at 2:51 p.m.

Upon resuming at 3:02 p.m.

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**Marcia Jones :** Welcome back, everybody. So next on our agenda for the afternoon we have two provisions, which are designated relief areas on secure side of terminals, which we'll cover first, and then finally, requirements for a lift, ramp or stairs. So appreciate this is a pretty heavy agenda. I just want to let everyone know we've covered about I think 19 groups of provisions and we have 2 left, so great job by everybody in the discussion on these topics.

So with regard to designated relief areas on secure side of terminals, this will come into force on June 25, 2021. This is subsection 227(4) of the Regulations. And it provides that a terminal must have a designated area for service dogs to relieve themselves that the person with a disability may reach, from the area of the terminal into which access is strictly controlled, by means of a path of travel that is accessible to persons with disabilities and does not require the person to exit and re-enter that area.

So a bit of background on this provision. Section 2.5.1 of the Passenger Terminal Code of Practice notes that, where possible, persons travelling with service animals should have access to a relieving area within secured areas for use between connections. Where this is not possible, one should be easily accessed from secured areas as to minimize the time required to relieve a service animal.

Prior to the requirement for secure side relief areas being raised through the ATPDR, terminals in Canada had not focussed their attention on this standard. So this will be a new requirement for most terminals.

We would like to hear from transportation service providers regarding any suggested approaches or interim measures that could be implemented, until such time as they are compliant with this section, and any further details that could be provided, such as timelines to achieve full compliance, if interim measures are adopted, are feasible, and what the costs are. And then finally, I guess I'll note as well, we've heard some concerns from the disability community separately about the, the areas that are being designed and whether they would actually meet the needs of, of service dog users. So I want to make sure that we set aside some time to have that discussion on kind of best practices.

So let me start first by hearing from those who've requested an exemption. They are Montreal Airport, Calgary Airport, Quebec City Airport, Thunder Bay Airport and Prince George Airport. If anyone at the table would like to comment on, on progress and interim measures, thank you.

**Glenda Nicol :** We have a raised hand from Joanna with Hamilton Airport.

**Marcia Jones :** Great. Thanks, Joanna. Please go ahead.

**Joanna Zyma :** Hi, Marcia. We're not looking for an exemption, but we are looking for some information on if there are standards for the building design requirements. The cost to implement varies depending on the complexity. Again, we're a smaller regional airport and what we have designed is very simple, but we really need – would like to hear from the others on building design requirements and if CTA is able to provide that. Thank you.

**Marcia Jones :** Okay. Thanks. You raise some good points. I mean, I guess a couple things. One is that the, the requirement of, like, what's expected is set out in our, in our regulation. It doesn't necessarily have to be, you know, complicated. It could be quite basic. It could be achievable with less investment. The important point is that there is a, like, an appropriate relieving area that meets the needs of the disability community.

I guess also, like, you know, I think the points that you've raised about the small versus the large airport, I think it's, you know, quite possible that airports could be managing this in different ways, depending on their size and configuration. So that's, that's something that we'd like to hear about. So the answer – the short answer to your question is, is no. You know, it's important to consult with the community to make sure that, you know, that it's, that it's an appropriate area, and we do expect that there might be some differences in how it's implemented from one airport to another.

**Glenda Nicol :** We have two raised hands, one from Thunder Bay with Jackie and another one with Merilee from Calgary Airport Authority.

**Marcia Jones :** Okay. Thank you. Jackie, please go ahead.

**Jackie McIver :** Hi, Marcia. Thank you. I'm just wondering in the interim, while we look at kicking out, we're going to have to take out a storage space closet and turn that into the secure area for service animal relief area. I'm just wondering in the interim if we could have a security escort bring them out, outside while we get this in play.

**Marcia Jones :** I mean, I think that's something I don't know if we specifically considered, but that's, that's an interesting suggestion we can discuss more, for sure. I don't – I can't give you an answer right away, but it's an interesting suggestion.

**Jackie McIver :** Okay. Thank you.

**Marcia Jones :** Merilee Adams, I think you were next.

**Merilee Adams :** Yeah. Thank you, Marcia. In Calgary, we currently have one in our domestic terminal and we will actually have two temporary locations in our international and transborder terminal by the deadline in June of this year, so we're okay.

**Marcia Jones :** Okay. Thank you for that clarification.

Are there any other comments from terminals who've requested this delay?

**Glenda Nicol :** We have a raised hand from Sophie with Quebec City Airport.

**Marcia Jones :** Okay. Thank you.

Sophie, please go ahead.

**Sophie Lambert :** It's the same for us in Quebec City. We did receive confirmation I think back in January, so we moved forward to set up the relief area in secure zones, so we should be ready by, I would guess, the summer. So I, I think we're going to be able to reach the deadline for June 2021.

**Marcia Jones :** Okay. Thank you.

Could I now invite the disability community to share some observations on secure side relief areas that have been shared with us? And I think this goes back to some of our earlier discussions around the importance of engaging with the community to, to make sure that provisions work as intended.

**Glenda Nicol :** We have a raised hand from Heather Walkus with CCD.

**Marcia Jones :** Thank you. Heather, please go ahead.

**Heather Walkus :** Hi. Well, relieving areas are my gem. So as they are for everyone with a guide or service dog.

One of the things that bringing this forward is that every airport's constructed different, and every airport has to look at specific ways that they can do it, especially in terms of plumbing. That is the number one issue.

The number two issue is no, there are no standards. However, there are best – better ways of doing it and cheaper ways of doing it than doing it in a, a very costly manner.

So working with guide and service dogs, especially the Coalition, we have worked with a number of experts in universal design and also in design. I have to say, Victoria Airport, kudos to you for working with Doug around that issue. I could save you some money by saying, you know, forget the fire hydrant, the fake fire hydrant put in place because that's not at all helpful. Our dogs are trained to squat, not to raise their legs so. But there are things that we can assist you to do and look at and how to do it. Most of our dogs are trained to go outside, not inside, so a very well-lit closet would be helpful. Ways around; certainly, there are things that you can do: find a quieter area, if you can't get all the plumbing and the engineering and all of that done. Cruise ships that I've travelled on have different methods of doing this, where they have boxes and – on the poop deck, usually.

And I'm trying to be light here, but it's a serious problem for people with disabilities who then have to go back through security to get to the outside and then come all the way back. And probably if you've got kids or you've got luggage or you've got something, it's a lot; it's a lot to go back and forth.

So workarounds, before we even had this, were flight staff took our dogs right onto the tarmac and relieved them for us and brought them back to us. There were different ways to do that, rather than having to go to the extreme of having to go back outside.

As you know, many of our dogs are trained and we – to relieve on certain times. We feed them or not feed them when we're travelling to cut this – the situation – to deal with this situation, because we can be four or five hours before we even get on the darn plane. And if the plane doesn't get off it could be – you know, a two-hour flight could end up to be an eight-hour rigmarole.

So we're certainly willing to work with each of the airports and talk about this and have airports share with each other. Maybe do another Zoom call or something around this very area. We can bring some experts to the table to talk to you about this, looking at workarounds, depending on your individual airport. And Prince George was well on their way until COVID hit and shut them almost totally down.

So there have been a lot of good discussions with us around this whole area, but utilize us; that's the important part there.

And I hear Janet's got her hand up. She's the rep from the National Coalition of People who use Guide and Service Dogs. I'm sure she has something to say here, too.

Thanks.

**Marcia Jones :** Thanks very much. And, Janet, please go ahead.

**Janet Hunt :** Hi, thank you.

Actually, Heather's pretty much covered it all. I don't have a heck of a lot to add, and I was going to say I personally don't have the expertise to advise on, you know, specifics about a relief area, except for my own personal experience.

But there's a lot of us out there, a lot of organizations that can help with that kind of expertise, if that's what you need.

And as Heather said, sometimes when you're travelling with a guide dog, as much as you try to control when they eat and when they relieve themselves, sometimes when they got to go, they got to go. So we have to have something, and any kind of

workaround, whether it's, you know, staff helping us out to an area outside; just having somewhere to go and some assistance to get there is better than nothing.

And I do appreciate all the work that's going into trying to design good spaces for us. So let's use the expertise that's out there and make it the best possible kind of experience for users and dogs that we can.

Thank you.

**Marcia Jones :** Okay, thanks very much.

**Heather Walkus :** I want to ask a question, Marcia.

**Marcia Jones :** Yeah.

**Heather Walkus :** Does the industry – I mean, we know they also have to do the outdoor relieving areas. And, again, we've got areas where it's really snowy so there's just, like, plain maybe cement, a fenced cement area. But inside, that's a whole different discussion and I really want industry to consider not just talking to your engineers about, you know, trench drains and those kinds of things but there's ways to do it that is much easier and much – can be cost-effective. But, again, you're dealing with building codes, and those kinds of things, so we have to take that into consideration.

But there are ways to do it and please, contact the coalition or myself at CCB, and we are more than willing to help you and support you and get you some good advice from people who do this all the time.

**Marcia Jones :** Thank you very much.

I mean, that's part of, I guess, the discussion we wanted to have about what's – kind of what's really needed, and making sure everyone's on the same page, so appreciate that offer of expertise to those who are having some difficulty with this requirement.

Are there any other comments on this issue?

**Glenda Nicol :** I see no other raised hands at this time.

**Marcia Jones :** So I think just to recap; so some airports sort of got started and then COVID hit and kind of impacted the work that they were doing. Some possible workarounds have been suggested today around either an escort to accompany somebody outside or to avoid that, a member of personnel bringing the service dog outside so the person doesn't have to go in and out of the secure area.

And then, also, some discussion around it's important for industry to connect with the disability community to make sure that it meets their needs and, you know, that people are aware of possible strategies to meet the requirements of this provision, which don't really set out a standard but just set out kind of the requirement to have an area; to ensure that that's not overly technical or more is being done than is really needed to get the job done, so to speak.

Any last comments on this before we move to the next provision? Okay.

So I'll move, then, to the next one, which is section 223, Requirements for a lift, ramp or stairs.

This provision takes effect on June 25, 2022, so it's not in force for over a year. So the provision requires that a lift, ramp or stairs used at a terminal for the boarding or disembarkation of persons with disabilities is there. It must meet the requirements for a lift, ramp or stairs, as the case may be, that are set out in section 69, section 70, or subsection 71(1) of the ATPDR.

Section 69, Lift, provides requirements around a lift. So, for example, it must have handrails that are located on both sides of the lift and a slip-resistant surface, and also be capable of supporting a minimum weight of 363 kilograms, which is 800 pounds.

Section 70, Ramp, states a ramp that is used to assist a person with a disability, including a person in a mobility aid, to board or disembark an aircraft; must have various features so, for example, contrasting colour strips that runs the full width of its bottom edge and raised edges. There's some other requirements as well.

Section 71(1), Stairs, enumerates requirements related to stairs used to board of disembark from an aircraft, as well as interior stairs used on an aircraft. So there are specific sections of Canadian Standards Association standards that are required. There's

handrails that are required with specific technical requirements, as well as tactile attention indicator surfaces that have specific requirements.

So in terms of background information, Section 2.4 of the Passenger Terminal Code of Practice set out general practice and expectations for boarding and deboarding, and section 2.4.1 specifically addressed boarding bridges, platforms, or gangways but did not set out specific requirements or details regarding accessibility, unlike the ATPDR, which is fairly prescriptive for the requirements.

And so we have the understanding, it could be inaccurate, but that the weight requirement for the ATPDR lift or ramps perhaps might be the largest obstacle to implement the requirements. We could be wrong, but we'd like to hear from transportation service providers to better understand what the challenges are; what measures you have in place now with respect to lifts, ramps, and stairs, and how they differ from the requirements set out in the ATPDR. So just looking to see. So these exemptions were requested by Quebec City and Montreal Airport. So we'll open the floor to discussion.

**Glenda Nicol :** We have a raised hand from Sophie with Quebec City Airport.

**Marcia Jones :** Thank you, Sophie, please go ahead.

**Sophie Lambert :** Just a quick question. Just to make sure I understand correctly, the provision 223 is, like, the airport's responsible for or the airline?

**Marcia Jones :** So 223 is the responsibility of the airport.

**Sophie Lambert :** Okay. Okay. We have to, to take a look at this further because we don't really own any of the equipment so.

**Marcia Jones :** Okay. I think – I mean, this, to my mind, goes back to earlier discussions. Like, we recognize there are situations where the carrier owns the equipment, and so, like, it's possible for a terminal to work that out with the carrier, like, through your commercial arrangements. But the responsibility to make sure that that's all in place is with the terminal.

**Sophie Lambert :** I'm sorry to interrupt you, Marcia, but it's almost the same as 225 for the wheelchair; right?

**Marcia Jones :** Exactly.

**Sophie Lambert :** So we are responsible for but for us we don't own the equipment. So we need to work that out with our partners.

**Marcia Jones :** Exactly. We know it's different from terminal to terminal for these types of things. So in that case, it would be working it out, yeah, with your commercial partners.

**Sophie Lambert :** Okay. I have no more comment. We have to think further this one.

**Marcia Jones :** Okay. Thank you.

**Glenda Nicol :** We have a raised hand from Joanna with Hamilton Airport.

**Marcia Jones :** Okay. Joanna, please go ahead.

**Joanna Zyma :** Hi, Marcia. I think the question's already been answered, same as Quebec City, we don't own ramps or stairs or wheelchairs, but understand the obligation, so we'll be taking that away. Thank you.

**Marcia Jones :** Okay. Thank you very much.

Are there any other comments or questions from terminals on this?

Okay. I guess I'd like to hear from disability rights organizations, in particular, whether, you know, you've experienced any issues in, in boarding or disembarking, or, you know, any other comments generally on this. I know it's, it's a rather technical provision, but I'll open the floor to discussion just to make sure we hear from everybody.

**Glenda Nicol :** We have a raised hand from Louise Gillis with CCB.

**Marcia Jones :** Thank you, Louise. Please go ahead.

**Louise Gillis :** Yes, I'm just commenting on the – either the – some sort of a tactile or yellow line indicator on each of the steps, so that as one is going up or down the steps, they'd be able to find them. Somebody with low vision needs that in particular. So, whose responsibility is it then? Is it the airplane for the ones on the smaller flights that the stairs come down from the plane? And then again on the other ones that use the, the pull-up stairs to a plane that don't have – I can't think – they – you'd have to walk down the stairs on a, on the larger type of stairs that are pulled over from the sidelines to the plane when it lands. There's stairs there and there's no indicators on them, so one could tell the difference in the steps. So who's responsible for painting those yellow lines on each step? I guess that's the biggest thing that I have and concerning those things. Everything else is more for the larger airports, and they're usually marked fairly well.

**Marcia Jones :** Okay. Thank you. So these provisions cover the stairs that are used to board or disembark from an aircraft and interior stairs of an aircraft. The tactile indicator services that I mentioned, 71(1) applies to airports, but that said, there are technical requirements that apply to aircraft as well.

**Louise Gillis :** They can be, they can be tactile, but they're probably not coloured as in a different resolution between the – or contrast between the step.

**Marcia Jones :** Oh, sorry, I didn't understand your --

**Louise Gillis :** Just so – yeah.

**Marcia Jones :** -- question.

**Louise Gillis :** Yeah.

**Marcia Jones :** Yeah.

**Louise Gillis :** It's, like, it's --

**Marcia Jones :** Yeah.

**Louise Gillis :** — the step is aluminum or some other colour or carpet on it or something. And then —

**Marcia Jones :** Right.

**Louise Gillis :** — the edge of the step you can't see it because there's no line on it.

**Marcia Jones :** I believe that's covered by the CAS, the Canadian Standards Association Standard that's referenced in the, in the regulations. I'm not sure if, Sue or Glenda, you're able to confirm that now?

**Glenda Nicol :** Hi, it's Glenda speaking. I am cautiously certain that that is included in the CSA Standards, but I'm just looking to check that right now.

**Marcia Jones :** We can get back on that point.

**Louise Gillis :** Sure, yeah. Thanks.

**Marcia Jones :** Yeah, thanks for raising that.

Heather, I think your hand is raised as well?

**Heather Walkus :** Yeah, I'm just trying to understand, Marcia, what exactly this provision, what are people asking about and for? And how, how does this provision impact change for, for someone who uses stairs, ramps, lifts? If you can quickly go over that? My, my head is swirling at the moment —

**Marcia Jones :** It, it has been an extensive few days of discussion. So, I mean, basically, like, these are intended to be more prescriptive in, like, I guess robust standards for lifts, ramps, or stairs to assist persons with mobility issues or, or other disabilities when kind of transferring between the, the terminal and the aircraft. So, there's always been Code of Practice kind of suggestions or best practices, if you will, around this. But the intent is to make it more robust. It's not in force yet, and they're highly technical standards. So, basically, some terminals are asking for more lead time to

come into compliance with this, given the, the intervention of COVID, and also it seems commercial relationships in terms of who owns that equipment.

**Heather Walkus** : Okay. So what we're looking at is what exists now and how soon can we make it better, and it may take some time. Am I correct in --

**Marcia Jones** : That, that's correct. Like, I think this one is possibly -- like, we've, we've triaged this as a C provision in that, like, the technical standards are quite clear. May not be any sort of practical workarounds, but it, it's sort of just better understanding kind of the concerns, where we're at in implementing them, if the disability community has any perspectives on, on this, recognizing it's, again, quite technical.

**Heather Walkus** : Well, certainly, one of the issues that always comes up is when you're transferring people, and a number of people have big chairs, and they're 3, 400 pounds, and they have to go in, in the luggage under the plane, I mean, there's some work being done on that, how to -- I believe the Canadian Research Council is doing some work on how to stow those chairs properly so they're not wrecked. But it's the -- where I hear the most complaint from the cross-disability community outside of the blind community is the idea of feeling like a piece of luggage. If you get transferred into a chair, you know, with no arms, so that it can -- you can be brought into the plane, say, I, I'm assuming we're -- this is aircraft we're mainly talking about?

**Marcia Jones** : Yeah, it's airports, so, yeah, embarking and disembarking from the airport to the aircraft.

**Heather Walkus** : Right. And so that many times there's a -- if you cannot move and, and cannot get -- have the mobility to get in and out of the chair yourself, you're 100 percent relying on human lifting you out of your chair that is designed for you, putting you in a chair that is not designed maybe for the curvature of your back or some of the things you, you carry with you as a person in the chair does and then getting up into the aircraft.

There isn't a lot of room, manoeuvrability for people who bring you in on a chair and the -- people have said they don't feel safe on many of the lifts. They feel very unsure what's going to happen. They bump, depending on the lift operator, or the lift itself may not

have really nice smooth controls, so they're bumped, bumped, bumped until they get and hit the plane and then they're rolled.

So there's those kinds of concerns people have, and unless there's better equipment and smoother equipment and a smoother transfer, especially – we're mainly talking about planes that disembark outside of the walkways that are connected to the airports.

That is a huge issue for a lot of people. It creates pain and then, if they get to be lifted again into a seat, that again is not – and again, that's not the lifts, but it's still a lift. Lifting up out of one chair into the seat on the plane is another fear factor. That's where most problems happen. If there's going to be harm done to a person in a chair, that's where it is, in the transferring.

So I don't know that what I'm saying is going to assist, but certainly the technical changes are there to reduce harm and also to assist other people who are assisting people to get in and out of these crafts. Those are important considerations.

Again, it's one of those things, how long is it going to be? Well, how long is COVID going to settle down? I mean, those are the questions. And it's – and also identifying who's responsible for those pieces of equipment, but that's – that's – a lot of people from the mobility challenged are talking about that as the biggest risk for them in travelling, is those lifts.

And again, as Louise pointed out, issues around tape and colouring, I mean, a lot of times you get the actual, you know, roll-up stairs but they narrow at the top, usually, and the arms are not connected to each other. When you go down, you have to stand onto a platform and then get down onto the ground, so those – wherever you have a change, they're not identified well, and that's part of the problem, too, for vision-impaired people.

And also for blind people, it's not smooth. It's not – we track things based on, you know, the – everything being the same, so as you come out of a plane, you've got narrow – you've got this narrow handlebars and then, all of a sudden, they widen out and then you go down the stairs and then they – you have to have maybe a foot space to the platform bars that you have to grab and then you go down.

And the only way we manoeuvre those is the good discussion with the person assisting us coming down off those stairs, is that they describe what's coming next and that's – that's really helpful.

I don't know how that's going to change with the new technical regulations, though, but that's always where we fall, is whenever there's a change.

Thanks.

**Marcia Jones :** Thanks. That's really helpful input on this.

Joanna, I think you've got your hand up, from Hamilton Airport.

**Joanna Zyma :** Yes. I just need some clarification.

I understand when we refer to a ramp or stairs, but how is a lift the same as a ramp and a stair? And maybe I'm just confused on what you're defining as a lift because I understand the airlines use a lift to manoeuvre people through the aircraft, but is this regulation not specific to the terminal?

So I'm just confused on what – where our responsibility is on what piece of equipment.

**Glenda Nicol :** Hi. It's Glenda Nicol speaking. If you don't mind, I'll step in.

So this provision also applies to – it applies to all terminal operators, so it would also encompass rail terminal operators who, if there is not a lift built into the train, there are lifts at the stations that are used to lift people on and off of the rail car.

**Joanna Zyma :** So we wouldn't technically have one, then, at our airport.

**Glenda Nicol :** No. As long as there are means to ensure that a person using a wheelchair or all persons can board and disembark the aircraft, it's – it doesn't matter which means you use.

**Joanna Zyma :** Okay. All right. Thank you.

**Marcia Jones :** Okay. So I think, just to recap, it seems like there's different commercial arrangements around this type of equipment. CTA staff can provide a little

bit more clarity on the technical specifications around indicator strips, what would be improved through the CSA standard.

I think it sounds like, you know, just generally, you know, everyone agrees this area is important. Again, it's fairly narrow. And I think that kind of covers off this provision.

I don't know if there's any further comments on it.

**Glenda Nicol :** I see no other raised hands at this time.

**Marcia Jones :** Okay. So that concludes our discussion of these provisions.

Before I turn to closing remarks, I just want to see if anyone has any last comments or feedback on this generally.

Okay. So I want to thank everyone again today for your time and input, of course, not just for today's meeting, but through all three meetings. So we really appreciate all of this feedback and expertise at the table.

Once again, a transcript of these meetings will be provided to everybody and we'll send an email out notifying you when the transcripts are available. We'll also be posting the transcripts in both English and French on our website at a later date, and these proceedings, the transcripts will be provided to the panel for their consideration.

So we really appreciate, again, everyone taking the time. It's very difficult right now. We know that it's a lot of time, so I think it was very valuable. And if you have any further questions, don't hesitate to reach out to me or my team.

**Kerianne Wilson :** I just want to say thank you.

**Marcia Jones :** Thanks, everybody.

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The meeting concluded 3:40 p.m.

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## **Certification**

I, Mathieu Bastien-Marcil, a certified court reporter, hereby certify the foregoing pages to be an accurate transcription of my notes/records to the best of my skill and ability, and I so swear.



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Mathieu Bastien-Marcil

March 23, 2021