



January 30, 2017

The Honourable Carla Qualtrough
Consultation – Accessibility Legislation
c/o Office of Disability Issues
Employment and Social Development Canada
105 Hotel-de-ville Street, 1st Floor, Bag 62
Gatineau, QC K1A 0J9

Dear Minister Qualtrough,

The Canadian Urban Transit Association's (CUTA) Accessible Transit Committee is dedicated to improving accessible transit service delivery in Canada and enhancing the passenger experience. This is accomplished through sharing information and best practices, facilitating learning opportunities and engaging in research.

CUTA, as the national organization representing Canadian public transit systems, is well positioned to communicate with and solicit feedback from our members in the urban transit industry about proposed accessibility legislation.

The Canadian urban transit community wants to be welcoming to everyone. We look forward to any recommended changes brought about by the new Federal Government's accessibility legislation that will assist us in delivering our services better to persons with disabilities.

Our recommendations are as follows:

1. CUTA would like to work with the Federal Government in developing its proposed accessibility legislation. CUTA members could make an important contribution given their wealth of knowledge related to urban transit and mobility. If there are plans to put together an Advisory Committee in developing the legislation, CUTA would like to be represented.

2. The government should recognize that transportation, from a point of origin to a destination, is almost always multi-modal and that creating seamless links between these modes is vital to the accessibility of Canada's transportation network.
3. Communities of different sizes, in different regions of Canada face unique accessible transportation challenges. The proposed accessibility legislation should recognize and respect the diversity of these communities' needs.
4. Any new federal accessibility legislation should clearly define the responsibility of transportation service providers with regards to accessibility supports. For example, the difference between what airports and airlines are responsible for should be clearly outlined.
5. There is no consistent approach to delivering accessible urban transit services across Canada. The federal government should work closely with provinces, in respect of the jurisdictions, to encourage a more consistent approach to service delivery and ensure Canadians benefits from high quality services and standards in all communities across the country.
6. Some provinces already have legislation in place, like Ontario's *Accessibility for Ontarians with Disabilities Act*, which mandates certain accessibility requirements for fixed-route and specialized transit systems. The work that has been done with this Act and others could compliment and inform federal accessibility legislation. It is important that federal accessibility legislation compliment, enhance and support existing legislation affecting transportation.
7. Customer convenience and satisfaction is greatly enhanced when transportation providers are collaborative in providing services. One example for consideration would be service animal guidelines.
8. Some proposed accessibility changes will have financial implications. Providing financial assistance to implement changes would be beneficial to ensuring timely compliance.

Sincerely,



Lynette Griffin
Chair
CUTA Accessible Transit Sub-Committee



Patrick Leclerc
CUTA
President and Chief Executive Officer