



Testimony

**ACCESSIBLE AIR TRAVEL:
ADDRESSING CHALLENGES FOR PERSONS WITH DISABILITIES
STATEMENT OF AIRLINES FOR AMERICA (A4A)
BEFORE THE
UNITED STATES HOUSE COMMITTEE ON TRANSPORTATION AND
INFRASTRUCTURE
SUBCOMMITTEE ON AVIATION**

NOVEMBER 17, 2022

Good morning, my name is Graham Keithley, and I am Vice President and Associate General Counsel at Airlines for America (A4A). A4A appreciates the opportunity to testify today, and I am honored to be presenting alongside our disability community, airport and Federal partners on this important topic.

A4A thanks the Committee for holding this hearing, and your commitment to oversight of passenger accessibility issues. The hearing reflects the important and growing attention by all stakeholders to improve air travel accessibility for persons with disabilities. A4A members are committed to accessibility, and they are working diligently with disability community partners, the Department of Transportation (DOT), the Federal Aviation Administration (FAA), and other stakeholders to improve air travel accessibility. A4A members take these issues very seriously and are committed to the dignity and respect of all passengers.



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All stakeholders recognize more work needs to be done. U.S. airlines are the first to acknowledge that even one incident that jeopardizes the safety of passengers with disabilities is unacceptable. A4A member airlines are fully committed to improving air travel accessibility for passengers with disabilities and have taken on several initiatives to better the disability community's travel experience in both the short and long-term.

Background

Congress has long recognized the unique complexities and challenges of air travel for individuals with disabilities. With that understanding in mind, in 1986, Congress passed the Air Carrier Access Act (ACAA) which rightfully protects the individual rights of those in the disability community from discrimination while also ensuring aviation safety.

The ACAA directed the DOT to issue and promulgate a regulatory framework uniquely designed to address traveling with disabilities in the aviation environment, which is unmatched by any other industry. In aviation, passengers are exposed to forces unobserved in any other mode of transportation and in a vehicle with sophisticated engineering and design that ensures an unparalleled level of safety for all passengers and crew. Airline networks and operations are more complex than any other mode of travel. Accordingly, DOT, with its special expertise in this aviation environment, standardizes the removal of air travel barriers through its regulation under the ACAA,



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helping ensure seamless, safe and accessible travel for passengers with disabilities.

Today, the airline industry complies with the resulting regulatory framework.

Airline Efforts to Improve Accessibility

A4A passenger members are dedicated to improving air travel for passengers with disabilities. Most recently, our members announced a renewed commitment to improve accessibility and support for the DOT's Passengers with Disabilities Bill of Rights. This commitment was established after hearing from passengers with disabilities and their advocacy organizations about accessibility concerns, including those raised during A4A's passenger accessibility summit, which was instituted last year.

As part of the commitment, our members have committed to taking distinct actions to improve air travel accessibility. Each member will have a passenger accessibility advisory group that includes the disability community to more acutely help airlines incorporate accessibility into their policies and operations. Mobility aid handling is also a focus area of improvement, including the transfer of passengers between their mobility aids and seats. Additionally, accessibility services training will be improved for all frontline employees and carriers will educate all their employees about passengers with disabilities. Finally, our members also continue to support the study and development of more accessibility features on aircraft that will broaden air travel opportunities for



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passengers with disabilities. While some improvements will take time, our members are committed to making progress and taking action to implement these commitments.

Collaborative Efforts to Improve Accessibility

Over the last decade, A4A passenger carriers have and continue to be actively engaged in many collaborative efforts to improve air travel accessibility in addition to their respective internal efforts. These initiatives include:

2016 DOT Negotiated Rulemaking. In 2016, the airline industry, aviation stakeholders, the disability community and the DOT came to an agreement on regulations for accessible lavatories on single-aisle aircraft and improved accessibility of in-flight entertainment. The DOT is now finalizing the regulations on accessible lavatories. The industry looks forward to the implementation of those agreed upon terms and items.

DOT Air Carrier Access Act Advisory Committee. Air carriers have been heavily involved with the DOT's Air Carrier Access Act Advisory Committee (Advisory Committee) which was formally established in September 2019 per direction from Congress in the *FAA Reauthorization Act of 2018*.



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Earlier this year, that Advisory Committee sent a final report to DOT Secretary Pete Buttigieg which contained 26 consensus recommendations, including fifteen best practice recommendations specific to industry, including airlines, airports and manufacturers. The recommendations target an abundance of accessibility issues varying from ticketing practices, seating accommodations, stowage of assistive devices, assistance at airports and on aircraft, to related training.

Based on the Advisory Committee's recommendations, the industry has already been hard at work. Led by the International Air Transport Association, (IATA), the aviation industry and the disability community are developing industry-wide guidance and best practices for the handling and stowage of mobility aids to reduce the potential for mobility aid damage. A4A and Airports Council International – North America are establishing a working group to develop guidelines and best practices for assisting passengers with disabilities with self-identification upon arrival at the airport.

Carriers also look forward to participating in the reconstituted Advisory Committee that the DOT is reestablishing now.

Rehabilitation and Engineering Society of North America. The aviation industry is also working with an interdisciplinary association for the advancement of rehabilitation and



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assistive technologies, familiarly known as Rehabilitation and Engineering Society of North America (RESNA), along with the disability community, to develop standards for mobility aids and air travel. Last year, RESNA issued its requirements and test methods for mobility devices better designed for air travel. The standard includes features that will facilitate airlines' handling and stowage for air travel, such as tie down points, markings, and air travel configurations. Through RESNA, the aviation industry continues to work on the next chapter to address the handling of mobility aids that meet RESNA's design standards.

Other Collaborations. A4A and our members are also working closely with various disability community organizations. Our efforts include, but are not limited to:

Assistance Dogs International (ADI). ADI is a worldwide coalition of non-profit programs that train and place Assistance Dogs. The airlines have worked with ADI to improve air travel for passengers traveling with service dogs, including facilitating travel for trainers who are delivering service dogs to their handlers and addressing conflicts with rules in foreign countries. We are also working with guide dog user advocates on potential state-level projects to reduce fraudulent service dogs that jeopardize the safety of our passengers, the accessibility of passengers that use legitimate service dogs, and the safety of our employees.



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Transportation Security Administration (TSA) Aviation Security Advisory Committee's (ASAC) Passengers with Disabilities Working Group. Through A4A, the airline industry is also actively engaged with the TSA to improve accessibility during the security screening process. Airlines already provide assistance to passengers with disabilities during security screening, but the industry continues to work on ways to improve coordination among our TSA, airport and disability partners to remove potential barriers faced during security screening.

Holistic Solutions Needed

Airlines are committed to continual improvement on accessibility issues, but some instances call for holistic and broader solutions outside the narrow parameters of the aviation industry. For example, an area that airlines have asked DOT and all stakeholders to focus on is mobility aid design. Design is a significant barrier and the root cause of many mobility aid damage situations. Unfortunately, many mobility aids are simply not designed for the rigors of air travel and many are solely designed for in-home use. Specifically, many mobility aids lack tie-down points that would allow airlines to better secure the mobility aids in the cargo area of the aircraft and prevent damage during take-off, landing or turbulence. We have strongly encouraged stakeholders, including lawmakers, the health insurance industry and the mobility aid manufacturing



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community, to recognize that individuals who use mobility aids routinely travel by air and that we need solutions that ensure that mobility aid designs facilitate safe and seamless air travel. As Congress reviews this and many other accessibility issues, we encourage lawmakers to broaden the factors considered in finding effective solutions in a more holistic manner.

Commitment

In closing, the safety of our passengers, including passengers with disabilities, as well as our employees, is the top priority for U.S. airlines. As reflected in our members' most recent commitment, we are dedicated to an inclusive experience for passengers with disabilities. We appreciate and look forward to continuing our collaboration with Congress and our partners testifying today to identify air travel accessibility barriers and solutions. A4A members have doubled down on their efforts to improve accessibility and ensure that passengers with disabilities are treated with dignity and respect. Along with our partners, we look forward to identifying and implementing holistic solutions that are realized collaboratively, safely and efficiently—ensuring that air travel remains inclusive and available for all passengers.