



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

July 9, 2018

Ms. Blane Workie
Assistant General Counsel, Office of Aviation Enforcement and Proceedings
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Re: DOT-OST-2018-0068

Dear Ms. Workie,

The undersigned co-chairs of the Consortium for Citizens with Disabilities (CCD) Rights and Transportation Task Forces write in response to the advance notice of proposed rulemaking (ANPRM) published by the Department of Transportation (Department) concerning access for service animals, including emotional support animals, under the Air Carrier Access Act (ACAA). CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society.

Following the Department's Accessible Air Transportation (ACCESS) Advisory Committee's impasse during negotiations on whether to amend the definition of a service animal under the ACAA, members of the Rights and Transportation Task Forces submitted principles that we believed that the Department must consider in revising its rule. These principles included continued access for emotional support animals, fair treatment for all service animals, and improved training for air carriers and their contractors in interacting with people with disabilities who use service animals. The full list of principles is available here: <http://www.c-c-d.org/fichiers/CCD-Rights-Letter-Service-Animal-Concepts-for-Reg.pdf>.

We hope that you will carefully consider these principles when drafting any revision to the existing service animal regulations under the ACAA. Service animals and emotional support animals serve a critical function for people with disabilities who require their assistance. We caution against any requirements that would significantly burden the ability of people with disabilities to use service animals or emotional support animals in air travel.

Sincerely,

Rights Task Force Co-Chairs

Heather Ansley
Paralyzed Veterans of America

Dara Baldwin
National Disability Rights Network

Jennifer Mathis
Bazelon Center for Mental Health Law

Transportation Task Force Co-Chairs

Dara Baldwin
National Disability Rights Network

Carol Tyson
Disability Rights Education and Defense Fund