



CONSORTIUM FOR CITIZENS
WITH DISABILITIES

September 22, 2021
Via Regulations.Gov

U.S. Department of Transportation
Docket Operations
1200 New Jersey Avenue SE
Washington, DC 20590

**Re: Comments Concerning the Request for Information on Transit Safety Concerns
Docket No. FTA 2021-0011**

The undersigned co-chairs of the Consortium for Citizens with Disabilities (CCD) Transportation Task Force appreciate the opportunity to respond to the request for information on Transit Safety Concerns. CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. As a ridership group that is uniquely reliant on transit, people with disabilities have unique concerns and interests related to transit vehicle and system safety. We urge the Federal Transit Administration to account for the accessibility of the safety systems that are put into effect and to actively seek rider-oriented perspectives on safety priorities

Question (1) What transit safety concerns should FTA consider analyzing through its SRM process for small transit providers? Large transit providers? Rail, bus, and multimodal transit providers? Briefly describe why each identified safety concern should be considered, including any data-based evidence that may be available.

In most cases, accessibility improvements are not only important for achieving equitable access, but they are grounded in mitigating possible safety incidents. Additionally, accessible communications and emergency response planning ensures that everyone's safety can be protected in the case of expected or unexpected travel disruptions - whatever the cause. The

Task Force wishes to elevate the following concerns in the FTA's safety planning. Please note that this list may not be exhaustive.

1. **Between-car barriers on train and rail transit lack sufficient study and data to understand the effectiveness of various barriers in different types of rail configurations and station platforms.** As an example, we point to recent concerns over the between-car barriers on WMATA 7000 series trains which raised awareness about the importance of prioritizing the safety through accessibility only after a close call incident that resulted in injuries to a blind rider.
2. **Clear audible and visual text announcements are necessary for ensuring that passengers with disabilities are aware of situations impacting their safety.** Some transit systems fail to adequately ensure reliable and consistent clarity in their announcements. Clarity should include both the technical features to deliver the message and producing announcements with simple, short, straightforward language that accommodates riders with cognitive disabilities. Providing multiple message modalities, such as conveying image-based messages where possible, also benefits riders' comprehension. In addition to improving implementation of accessible and clear announcement systems, the Federal Transit Administration should promote efforts to develop the capacity to communicate effectively with deafblind riders. For example, sending text-based announcements in real-time to smartphones or other devices may provide additional safety access for some deafblind riders if access to mobile networks is available.
3. **Services changes and communications must be distributed quickly, clearly, and through multiple channels that accommodate the needs of individuals riders who are Deaf, blind, deafblind, or who may require plain language or non-English announcements.**
4. **Emergency management practices must actively incorporate the transportation, communication, and accommodations needs of people with disabilities.** FTA should require emergency management programs to incorporate research, planning, and training that is inclusive of people with disabilities.
5. **Elevator availability and communication about accessible entries and exits are critical to ensure the safe movement of people with mobility disabilities.** In particular, so-called "legacy" rail transit systems have significant work remaining to improve safe access to elevators and accessible entries, but maintenance of elevators systems is also an ongoing concern. Additionally, there should be clear signage indicating the location of the elevators.
6. **Developing accessible navigation routes with appropriate and effective information access has implications for movement during an emergency situation.** Guidance on accessible mapping is one opportunity for improving route access. Likewise accessible

wayfinding technologies assist riders who may have difficulty locating accessible signage in a large transit hub. Further developing accessible routes, mapping, and wayfinding may prevent safety incidents and improve rider confidence when traveling through transit stations.

7. **Accessible bus stops and access via sidewalks play an important role in rider safety, particularly for riders with disabilities who require a smooth, barrier-free, accessible surface of travel.** While transit agencies themselves may not have jurisdiction over the installation of sidewalks, they should actively partner with the right-of-way owners to ensure that riders have safe, reliable access to the transit system that does not jeopardize their safety by requiring them, for example, to ride in the street or cross multilane traffic without adequate and accessible traffic controls. Transit agencies often do have greater control over the safety of bus stops, including limiting construction barriers, clearing snow, and providing adequate cover during inclement weather.
8. **Several task force members noted issues with fall risks when buses lurch forward unexpectedly after people with disabilities board.** Operators should receive disability inclusive training that develops strategies for communicating with passengers, ensuring passengers have fully boarded, and ensuring that accessible seating is available.
9. **We encourage the FTA to consider the standardization and/or consistency of emergency call systems on transit vehicles.** In many systems, a call button may be available, providing voice access to an operator, but these systems are not consistently accessible to riders who are Deaf, hard of hearing, or do not speak clearly.

Question (4) Are there additional sources of information and data, beyond those detailed in this request, that FTA should consider in supporting the assessment and mitigation of identified transit safety risks?

In addition to considerations that may be unique to people with disabilities, we highlight intersectional needs affecting personal safety and enforcement. While many safety approaches relate to the design and operation of the vehicle itself, the inclusivity and effectiveness of public safety efforts also directly impacts rider and operator safety. Recently, the Transit Center released a report highlighting the impact of safety enforcement on Black and Brown people and exploring opportunities to make public safety enforcement more equitable and nonviolent¹. Additionally, as described in the report, creating opportunities for responding effectively to

¹ (2021). Safety for All. Transit Center: New York, NY. <https://transitcenter.org/wp-content/uploads/2021/07/SafetyForAll.pdf>

passengers experiencing mental health crises is an important aspect of alternate approaches to public safety.

As such, the Federal Transit Administration should incorporate input and data from rider advocates to understand additional safety concerns that agencies may not currently directly address in their safety assessments.

Thank you for considering these comments. If you have any questions, please reach out to the co-chairs listed below.

Sincerely,

Consortium for Citizens with Disabilities Transportation Task Force Co-Chairs

Sarah Malaier
American Foundation for the Blind
smalaier@afb.org

Lee Page
Paralyzed Veterans of America
leep@pva.org

Claire Stanley
National Disability Rights Network
cstanley@ndrn.org

Carol Tyson
Disability Rights Education and Defense Fund
ctyson@dredf.org