



**CONSORTIUM FOR CITIZENS  
WITH DISABILITIES**

March 2, 2020

Submitted Online

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: Accessible Lavatories on Single-Aisle Aircraft; Part 1, Docket Number: DOT-OST-2019-0180-0017

Dear Ms. Workie,

The undersigned Consortium for Citizens with Disabilities (CCD) Transportation Task Force Co-Chairs are pleased to submit comments in response to the NPRM on Accessible Lavatories on Single-Aisle Aircraft; Part 1. 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. While the ability to access an aircraft lavatory inflight is an opportunity most air travelers take for granted, people with disabilities often face barriers to the use of the aircraft lavatory that requires changes to their ability and willingness to fly.

The undersigned Co-Chairs echo the comments submitted by Paralyzed Veterans of America and support further defining “accessible” with respect to call buttons and door locks. Because standards for accessibly discerning and communicating information exist, airlines should not be permitted to develop their own methods of providing accessibility. Instead, changes to the interior of airplane lavatories must include accessible signage for passengers who are blind and visually impaired. If print signs or symbols are used to indicate instructions, such as where to dispose of trash, such signage should include the words in both print and braille. The braille code used should be the unified English braille code (UEB) as adopted by the Braille Authority of North America.

Furthermore, the printed letters should be in a large enough font for persons who are visually impaired to read, and the font should also be in contrasted colors to accommodate persons with low vision.

Contrasted colors often enable persons who are visually impaired to differentiate text or symbols. If symbols are utilized, they should be embossed, so blind persons can feel the symbol. For instance, if an arrow is displayed to direct a passenger where to go, the arrow must be embossed to a level that a passenger can identify it by touch. And again, the size should be large enough to accommodate someone with low vision.

Likewise, attendant call buttons and door controls should have distinguishing features and the aforementioned accommodations for tactile accessibility, including embossing, distinguishing textures, labels, and contrasting colors. We appreciate the inclusion of accessible controls in the proposed rule and encourage you to add definition for tactile accessibility and accessible communications - including braille and large, high-contrast print - to the proposed accessibility requirements.

Thank you for the opportunity to respond to this NPRM. Please do not hesitate to contact Claire Stanley at [cstanley@acb.org](mailto:cstanley@acb.org) with any questions.

Sincerely,

Sarah Malaier  
American Foundation for the Blind

Claire Stanley  
American Council of the Blind

Carol Tyson  
Disability Rights Education and Defense Fund