



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

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The Transportation Task Force of the Consortium for Citizens with Disabilities appreciates this opportunity to provide comment on the notice of proposed rulemaking (NPRM) on Americans with Disabilities Act (ADA) accessibility guidelines for transportation vehicles. Keeping guidelines up-to-date with current practices is one of the most important parts of the ongoing success of the ADA, and we believe that this rulemaking brings the vehicle guidelines into alignment with the needs of people with disabilities.

The Consortium for Citizens with Disabilities is a coalition of approximately 100 national disability organizations working together to advocate for national public policy that ensures the self determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

There are four areas in which we would like to provide brief comment:

1. The 1:6 ration for lifts;
2. Circulation paths;
3. Stop announcements; and,
4. Bus Rapid Transit (BRT) stations.

CCD supports the proposal to require bus ramp slopes to be no steeper than 1:6. . The new ratio provides greater safety and access to people with disabilities and is more in line with newer vehicle technology that allows this ratio. We appreciate that there is a need to gather technical information to assure that the 1:6 ratio is not untenable, but it is important that guidelines also advance technology and not just accede to current practice. We believe there is sufficient existing, affordable technology to achieve a 1:6 ratio. For those systems or manufacturers not meeting this standard, we hope that codifying the 1:6 ratio will drive progress towards greater accessibility.

On the issue of circulation paths, it is critical to provide the greatest possible room for maneuvering. We believe that the standards in the NPRM take a step towards that by widening the path of travel and the wheelchair spaces. It is critical that people with disabilities have the ability to not only board a vehicle, but also to position themselves in the vehicle in a way that meets their needs. With advances in mobility device technology, there is now a greater variety of mobility devices helping people maneuver in their environment. Allowing more room on vehicles will allow people with a variety of different mobility devices to access the vehicle.

This difference in size and performance of different mobility devices is an important one to consider. While we acknowledge that the definition of “common wheelchair” is not within the purview of the Access Board, we think there is a great deal of information that will be gathered during this process that should be shared with the Department of Transportation (DOT) regarding the current state of technology. This is particularly true in the areas of lift capacity and circulation paths. We urge the Access Board to provide DOT with the technical information available to help DOT update the definition of “common wheelchair” and to identify the areas where more information is needed.

Finally, on the issue of automated stop announcements, it is critical that the standard for automated stop announcement assure that every person has access to consistent and clear information on location. This is critical to the mobility of all individuals with disabilities including those with intellectual, developmental and sensory disabilities. The proposed NPRM takes a step towards assuring that good stop information is provided to all riders. We encourage the Access Board to keep the requirement for systems over 100 vehicles as it is drafted and to look to ways to expand automated stop announcement technology to smaller systems as the technology advances.

Again, we thank you for this chance to comment and look forward to working with the transit community to implement the new standards when they become final.

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