



## **CONSORTIUM FOR CITIZENS WITH DISABILITIES**

The Consortium for Citizens with Disabilities (CCD) Transportation Task Force submits the following comments on the draft Advisory Circular announced by the Department of Transportation's Federal Aviation Administration (FAA) concerning access to airports by individuals with disabilities. The notice was officially published for comment on May 6, 2016.

CCD is a coalition of national consumer, service provider, and professional organizations which advocates on behalf of people with disabilities and chronic conditions and their families. The Transportation Task Force advances the rights of individuals with disabilities in the area of transportation.

Airports present a confluence of accessibility laws and requirements due to the applicability of the Americans with Disabilities Act (ADA), the Air Carrier Access Act, the Rehabilitation Act, and the Architectural Barriers Act. In reviewing the draft Advisory Circular, the task force believes that the revisions greatly simplify the explanation of the various requirements airports must meet in providing people with disabilities access to their facilities. While application of the various laws in a place of overlapping requirements presents inherent challenges, the revised Advisory Circular shows how various accessibility requirements, and those with responsibility for those requirements, are reconciled.

We particularly appreciate the attention in the draft Advisory Circular to service animal relief areas and the use of way-finding technologies. Helping people with disabilities to travel as independently as possible is important to fulfilling one of the critical promises of the ADA. We urge the FAA to continue to implement policy that will facilitate independent travel and airport navigation for all people with disabilities.

Improving airport accessibility and thus access to air travel is critical to ensuring that people with disabilities are able to compete in today's job market and enjoy the same opportunities available to other Americans. The true success of this draft Advisory Circular must be measured by the degree to which the legal requirements it discusses are fully implemented. We believe that improving the clarity with which accessibility requirements under the law are conveyed to those responsible for their implementation is a critical first step toward full compliance.