

Commission for Aviation Regulation,
3rd Floor,
Alexandra House,
Earlsfort Terrace,
Dublin 2



16th., December 2008



Dear Sir/Madam,



Further to Notice on PRM charges at Dublin Airport, Commission Notice 5/2008 I would make the following comments.



As a wheelchair user and regular customer of Dublin Airport I fully participated in the consultation process undertaken by the DAA in relation to the implementation of EC Reg 1107/2006. As part of that process I made two written submissions to the DAA (see attachments).



Since reg 1107/2006 came into effect I have used the services provided by the DAA for PRMs. There has been a step change in the quality of service provided at Dublin Airport. The introduction of the ambulift service is a particularly welcome improvement which ensures PRM who require an ambulift are now afforded an efficient and safe means of accessing aircraft which respects the dignity and integrity of people with disabilities who require to be manually lifted. A secondary benefit is that I am now brought directly by ambulift to an entry point near the baggage reclaim hall in time to collect my bags before they are taken off the belt.



Having arrived at a point where we now have a quality service at Dublin Airport which fully complies with reg 1107/2006 it would not be acceptable to people with disabilities to have this service downgraded in any way.



I cannot comment on the specific charge shall be reasonable, cost related, transparent . but this service level is what we have come to expect in other EC member states and I imagine there is a mechanism for benchmarking the cost of the service across a number of EC airport authorities.



Yours sincerely,



David Egan,
Williamstown,

Cornamaddy,

Athlone,
Co. Westmeath



086 8226355

Submission 1 to DAA

Center for Independent Living (CMH)

response to

Dublin Airport Authority Draft Service Standards

in relation to

EC Regulation 1107/2006

January 1st 2008.

Center for Independent Living note the Dublin Airport Authority Draft Service Standard (DAA DSS) document will be used to “form the basis of the tender process for assistance provision at the three airports.”

From the DAA DSS document it is unclear to us what level of service potential contractors are being asked to provide, particularly around the substantive issue of getting wheelchair users onto/off aircraft.

We would like to see the DSS document state clearly that DAA policy is to use airbridges and where airbridges cannot be used, to use ambulifts.

DAA will have a view on how many ambulift vehicles and staff will be required to meet demand in each of the airports. Were this stated in the DSS document it would give some comfort about the intention of the DAA regarding the type of service they intend providing. The DSS document states that the preferred mode of transfer for PWD “include” ambulift. The word “include” is ambiguous and suggests that there are other options which are also acceptable. This is not the case and we believe this sentence should read,

“Preferred modes for handling of passengers requiring assistance are ambulift or similar device.”

A “similar device” we take to mean a similar hydraulic type vehicle.

We would like to state again, for the record, the vast majority of people with physical disabilities do not believe the Cmax type chair is an appropriate or safe means of accessing an aircraft for the reasons stated in our original submission. This view should be conveyed to potential contractors for “assistance provision.”

We would like to see DAA DSS document expanded to carry comprehensive detailed guidelines on every aspect of the boarding/disembarkation procedures for PWD.

All public transport servicing points of arrival/departure should be wheelchair accessible.

Transport from point of arrival in Long Term Car Park to Airport Terminal should be wheelchair accessible.

These points are not reflected in the DAA DSS document.

We note DAA has adapted recommended ECAC minimum waiting times for assistance

The establishment of a Disability User Group in each airport is welcome. For monitoring purposes and practical feedback it would be helpful if User Groups were comprised of PWD.

The DAA DSS is incomplete in what it does not specify. We would envisage a much more comprehensive DSS document which in time would form the basis for a DAA Disability User Guide detailing every aspect of service available at all three airports for PWD.

More clarity around the communication interface between DAA and the service provider (assistance provision), the DAA and the carrier, and the service provider and the carrier would be helpful. Specifically, demarcation on where responsibility begins and ends for the agencies involved. Designated seating, fold-up arms, bookings and phone back, etc while not the responsibility of the DAA is none the less an important part of the experience for PWD.

Submission 2 to DAA

1. Is the current level of service provided by airlines and groundhandlers to persons with reduced mobility and disabled persons at Dublin / Cork / Shannon Airport appropriate?

The safest, most efficient and comfortable method of loading wheelchair users onto an aircraft is by use of an airbridge. This is the preferred method of choice for disabled people. However, not all carriers use airbridges for a whole raft of reasons.

DAA request that remarks are framed with reference to the "airline business model" in particular respecting "minimising turnaround time."

In the spirit of that framework the second method of choice for wheelchair users to board an aircraft is by "ambulift" or similar type vehicle. This method of transfer is safe, comfortable, dignified, and efficient for service users, and fulfills all of the "business" criteria for air carriers as outlined.

Many disabled people will NOT travel by air because they feel unsafe while being carried in a manual chair, or using a motorized stair-climbing chair, from the airport apron up the steps to the aircraft door. For most disabled travelers this is the most challenging aspect of boarding the aircraft. Many disabled people have little use of their upper body and no means by which to retain their balance while being lifted. The seat harness offers little security or confidence.

An ambulift obviates the need for any disabled person to use stairs. Boarding the ambulift is simple and safe and ensures a flat transfer from the lift to the aircraft.

An ambulift ensures the disabled passenger does not need to transfer from their own chair to an aisle chair until ready to board. This transfer can be effected in the comfort of the ambulift as opposed to the airport apron exposed to all of the elements and to public view.

The ambulift is a safer method of transfer compared to boarding by stairs.

The ambulift ensures less manual handling for staff and complies with best practice.

The ambulift offers the air carriers the most efficient and time saving method of taking disabled passengers onto/off aircraft provided the procedure is highly co-ordinated between ground crew, cabin crew, and ambulift crew etc having regard to safety and best practice.

It's efficiency relies on the correct "resource requirement" being in situ which is a matter for the DAA as outlined in your document.

4. Taking account of the detailed provisions outlined in Annex K of ECAC Document 30, are there particular procedures and equipment that should be integrated into the provision of assistance at Dublin / Cork / Shannon Airport?

The correct number of Ambulift type vehicles and commensurate staffing levels should be available in all airports to meet demand and ensure no loss of turnaround time by aircraft carriers.

This view has been endorsed by one major low cost airline. ***It is therefore essential that the DAA ensure that there is a sufficient number of ambulifts operating***

in DAA airports to ensure no loss of turnaround time by the air carrier.

Gatwick Airport have four ambulifts operating on a daily basis.

(Capital funding may be available to DAA from the Department of Transport for safety related capital items.)

The manual aisle seat currently in use at Dublin Airport is inappropriate. The DAA need to look

at aisle seats currently in use in European Airports and take advise from service users as to the most appropriate aisle seat. The aisle seat used in French airports gets much favourable comment.

Mandatory Disability Training for all staff involved with the loading of disabled passengers is essential.

Mandatory training in manual handling and lifting techniques is essential for all staff involved with loading of disabled passengers. Many disabled people suffer heavy bruising from poor handling/lifting.

Having successfully entered the air craft the next step is to effect a successful transfer from aisle seat to aircraft seat. This can be accomplished quite readily provided that the armrest of the aircraft seat folds up. If this is not the case the passenger will need to be physically lifted up over the arm, a difficult, heavy, undignified and unsafe practice which may need to be repeated three times if the carrier insists the passenger occupies the window seat.

It is essential that disabled people are assigned seats with fold-up arms in line with Reg EC 1107/2006 Annex II "the making of all reasonable effort to arrange seating to meet the needs of individuals with disabilities."

In addition it is essential that the disabled person sit adjacent to the designated person accompanying them as per regulation "where a disable person is assisted by an accompanying person the air carrier will make all reasonable effort to give such person a seat next to the disabled person." Current practice by some air carriers require that designated seating carry a surcharge. Carriers need to me made aware of this Regulation.

Pre-boarding should be offered to all disabled passengers.

It is essential that passengers who use wheelchairs have their chairs available at the aircraft door upon arrival or at reasonable time thereafter. Temporary use of a DAA wheelchair and subsequent reclaim of personal wheelchair in baggage hall is not acceptable.

2. Are European Civil Aviation Conference, Document 30, Part 1 and its associated annexes (particularly Annexes J, K & N) adequate for the purposes of establishing quality standards?

The National Disability Authority are responsible for quality standards.

3. Are there other documents that would be helpful in setting standards for assistance provision? Please specify and provide a copy if possible.

The Air Carriers Access Act 1986, (Amended 2000) see
<http://airconsumer.ost.dot.gov/publications/horizons.htm#AtTheAirport>

[Introduction](#)

[Planning Your Trip](#)

[The New Traveling Environment](#)

[Getting Advance Information About the Aircraft](#)

[When Advance Notice Can Be Required](#)

[When Attendants Can Be Required](#)

[At The Airport](#)

[Airport Accessibility](#)

[Moving Through the Airport](#)
[Passenger Information](#)
[Security Screening](#)
[Medical Certificates](#)
[Communicable Diseases](#)
[Getting On And Off The Plane](#)
[The Safety Briefing](#)
[Handling of Mobility Aids and Assistive Devices](#)
[Boarding and Deplaning](#)
[On The Plane](#)
[Aircraft Accessibility](#)
[Seat Assignments](#)
[Service Animals](#)
[In-Cabin Service](#)
[Charges for Accommodations Prohibited](#)
[Personnel Training](#)
[Compliance Procedures](#)

The Americans with Disabilities Act

5. Are there particular processes at other European Airports you would like to see adopted at Dublin / Cork / Shannon Airport?

Ambulifts are standard best practice in many European airports. This policy needs to be replicated in all Irish airports under the control of the DAA.

As per Article 5 of the Regulation, Dublin Airport intends to establish two designated points of arrival on the arrivals level and two on the departures level

6. Are these proposed arrangements adequate? What specific criteria should be taken into regard when establishing Points of Arrival / Departure?

“the managing body of an airport shall take account of local conditions, designated points of arrival and departure within the airport boundary at which disable persons can, with ease, announce their arrival at the airport.”

In respect of the above it is a matter of interpretation ‘to announce with ease’ your arrival at the airport. There are currently three ways of arriving at, or leaving, Dublin airport - private car, taxi or by bus.

A designated point of arrival in the long term car park will have limited use to a wheelchair user if the shuttle service is not wheelchair accessible. Does the regulation envisage a meet and greet service at the point of arrival? Is this the case in other airports?

Do disabled persons expect to be met at the point of arrival or to have the facility to look for help at that point through an intercom?

Wheelchair users arriving or departing by bus, private or BAC, expect the bus to have wheelchair access and that the point of arrival/departure is nearest the airport entrance. This is currently not the case if the only accessible service is moved to an island unit?

The information desk at all Airports should have contact numbers for wheelchair accessible taxi companies.

7. Other comments?

The requirement for disabled passengers to telephone the carrier after making an online booking is discriminatory. One major Irish airline licensed by the Irish Aviation Authority (IAA) will roll out new software in the second quarter of 2008 which will enable all details for disabled passengers to be entered online at time of booking without the need for a subsequent telephone call. The new Enforcement Body should ensure that all IAA licensed operators meet the same criteria.

There are a number of Irish registered air carriers currently licensed by the IAA who apply differing safety criteria in respect of the number of disabled passengers allowed on each flight. All Irish carriers have their safety procedures approved by the IAA. The DAA need to engage with the IAA to establish their safety criteria in respect of disabled passengers.

8. Please make any other submission relevant to the implementation of the Regulation at Dublin / Cork / Shannon Airport?