

Vancouver Airport Authority is committed to providing a positive airport experience for everyone. We have a long-term strategy focused on enhancing universal access at our airport and providing a welcoming airport environment. We appreciate the opportunity to provide feedback.

Communication

For a list of potential technical provisions for communication, see Appendix A.

1. *Please provide your views on the incorporation, in regulations, of the technical standards currently in the Communication Code referenced in Appendix A.*

YVR Response: Vancouver Airport Authority has reviewed the Communication Code referenced in Appendix A and does not have any further comments to add.

Training

1. *Do you have any comments regarding the previously-proposed amendments to the PTR?*

YVR Response: Vancouver Airport Authority does not have any comments regarding the previously proposed amendments to the PTR.

2. *Are there any additional requirements related to training that you think should be addressed in a new regulation?*

YVR Response: Vancouver Airport Authority does not have any additional comments related to training.

Terminals

1. *Please describe in detail, any significant difficulties that you may have in meeting any of the provisions set out in the Terminal Code (e.g. physical considerations in S. 1; facility considerations in section 2; service considerations in section 3)?*

YVR Response: Vancouver Airport Authority does not have significant difficulty meeting the provisions set out in the Terminal Code.

2. *Please describe any alternative or additional provisions (whether technical standards, facility considerations, service considerations, or other) that you think should be included in the proposed regulations?*

YVR Response: Vancouver Airport Authority does not have any additional comments.

3. *How do you ensure that persons using service animals can access a relieving area (indoor or outdoor) from the secure side of your terminal?*

YVR Response: Service animal relief areas are available in the US post-security departure area and curbside at International Arrivals in Chester Johnson Park. Both relief areas are accessible.

The US post-security departure relief area is available for use by passengers in the US departure area and at select times of day to passengers in the International Departures area. Domestic and International post-security passengers without the access to a post-security service animal relief area can exit the secure area to use the curbside relief area. Passenger assistance to the curbside relief area should be arranged with the respective airline.

4. *Please provide your views on the incorporation, in regulations, of the technical standards currently in the Terminal Code referenced in Appendix F.*

YVR Response: There are a number of areas that are open to interpretation in the terminal code and require clarification.

For example, a facility requirement is to provide “accessible boarding bridges”. It is not clear what is intended by “accessible boarding bridges” that meet CSA B651 as the CSA standard does not have requirements for boarding bridges. We recommend further discussion on requirements for specific areas of concern such as boarding bridges.

Incorporating the technical standards of the Terminal Code into regulations may make it more difficult to develop alternative approaches to accessibility. The Airport Authority has worked with a universal access consultant to develop better approaches for specific issues not well addressed in the codes and standards for accessibility in order to deliver meaningful access. Under a regulatory requirement, flexibility to go above and beyond should be considered.

5. *Describe any policy you have for ensuring the accessibility of new construction or renovations at your terminal facilities.*

YVR Response: Vancouver Airport Authority incorporates accessibility into all of its design features. The Airport Authority has established design guidelines for all renovations and new construction for both the airport at large and its tenants. The design guidelines were developed in consultation with architects, engineers and a universal access consultant to ensure that all legal requirements for accessible facilities are addressed; as well as additional accessibility features provided beyond that which is required. Design drawings are also reviewed by an independent universal access design consultant along with field reviews. The design guidelines are a living document and are continually updated and revised to ensure the Airport Authority provides a world class facility.

6. *What significant challenges, if any, do you think you might face if you are required to obtain the Agency's pre-approval for new construction and renovations which would reasonably be expected to impact access by persons with disabilities to your facilities?*

YVR Response: Pre-approval for new construction and renovations would impose significant challenges on the Airport Authority and its consultants, engineers and contractors.

Since 1992, the Airport Authority has consulted and worked with Brad McCannell, previously Canadian Barrier Free Design and now with the Rick Hansen Foundation, on all terminal designs, both new construction and renovations, to ensure it meets the needs of persons with disabilities and remains a leader in accessibility. Through this collaborative relationship, the Airport Authority has remained abreast of accessibility issues and has brought a consistent universal design approach to planning and operations.

The Airport Authority's universal access consultant, architects and engineers are experts in the area of terminal facility design, accessibility being a top priority of this, and applicable design requirements. The Airport Authority has long established approval processes for new construction and renovations to ensure that all design requirements are met and often exceeded. Obtaining the Agency's pre-approval for new construction and renovations would require the Airport Authority to amend its approval processes and adjust already constrained timelines.

Adding another layer of approval to an already established and exceedingly comprehensive design and approval process is not, in the Airport Authority's opinion the most valuable use of the working relationship with the Agency. The Airport Authority would receive greater value in working with the Agency to further develop accessibility standards.

One person, one fare

1. *Describe any policy you may have regarding airport improvement fees levied/not levied on attendants accompanying passengers with disabilities.*

YVR Response: The Vancouver Airport Authority (the "Airport Authority") currently does not have any policy in place to waive airport improvement fees ("AIFs") for attendants accompanying passengers with disabilities.

All origin and destination passengers that depart from the Vancouver International Airport (YVR) are subject to the AIF and the amount of such fee is based on the destination flown which varies from \$5 to \$20 per passenger, subject to certain exemptions described below.

The Airport Authority, together with other airport authorities across Canada, has entered into Memorandum of Agreement (MOA) with airlines operating from their airports for the collection of the AIF. The Air Transportation Association of Canada (ATAC) is also a party to the MOA. The MOA provides that the airlines will collect and remit to the airport authorities the AIF for passengers flying out of a particular airport. The Airport Authority is not directly involved in the collection of this amount from the passenger but rather the AIF is collected at the time a passenger purchases an airline ticket from an airline.

Under the MOA, the airlines are responsible to have systems in place in order to capture and collect the AIFs. The MOA provides an exemption for certain categories of passengers travelling through YVR (including connecting passengers, infants, and airline employees travelling for business and travel passes) however; it does not contemplate an exemption for attendants accompanying passengers with disabilities.

For those airlines that operate from the airport that are not a party to the MOA (the "Non-Signatory Carriers"), the Airport Authority has implemented collection procedures, known as the AIF Collection and Remittance Procedures, which are similar to those outlined in the MOA and obligates these airlines to remit and collect the AIF on behalf of the Airport Authority and the exemptions contained in the MOA are also applicable to the Non-Signatory Carriers.

2. *Please describe any significant difficulties you would face in implementing a policy to not levy airport improvement fees on attendants accompanying passengers with disabilities.*

YVR Response: For the Airport Authority to implement a policy that does not levy AIFs on attendants accompanying passengers with disabilities would require an amendment to the MOA.. The Airport Authority cannot unilaterally amend the

MOA but rather it requires the consent of all parties (airport authorities, airlines and ATAC) to this agreement. This will result in extensive consultation of all of the parties and ultimately mutual consent will be necessary for the MOA to be amended in order to adopt and implement a new policy. The Airport Authority does not have control of the result if all parties to the MOA do not agree to an amendment.

For the Non-Signatory Airlines, the Airport Authority would need to also amend the AIF Collection and Remittance Procedures in order to provide for such an exemption and work with the Non-Signatory Airlines to create some kind of mechanism where these airlines would be able to capture an exemption.

As the airlines are responsible for the collection of the AIF, imposing a new policy may result in changes to their reservation systems in order to capture this exemption. The Airport Authority is not aware how much effort will be required by the airlines to implement such technical changes of a new policy.

Another challenge in attempting to implement a policy is both the airport authorities and the airlines will need to decide and agree upon what criteria will be used to define what an "attendant" is for a passenger with disabilities in order to be eligible for any exemption. The definition of an eligible attendant could be subjective and subject to interpretation and industry wide standards would need to be established.

Curbside assistance

1. *Do you currently provide assistance to passengers with disabilities from the curb to check-in, including wheelchair assistance, guiding assistance for passengers with visual impairments, and assistance with luggage? If so, please describe how this works (e.g. how does a person with a disability ask for the service; who provides the service (airport staff; contractor); does it need to be prearranged, etc.).*

YVR Response: Passenger assistance for persons with disabilities is the responsibility of the airline and commences at check-in.

The Airport Authority or its third party customer care service provider may provide occasional assistance to passengers with disabilities in the event a service gap is identified. This can come to us through our information counters or our customer care call centre. In addition, the Airport Authority offers a 15-minute curbside pickup/drop off area for individuals who may need to be helped inside and have an accessibility parking permit. YVR also has a porter service which is a user-pay system to help customers with their luggage, anywhere from curb to carousel and back.

2. *If you do not provide this service, please describe any significant challenges you would have in providing this service.*

YVR Response: If volumes were to grow, the challenges to the Airport Authority in providing assistance to passengers with disabilities from the curb to check-in include man-power and financial resources, possible contract changes and business relationships with its airline partners.

In addition, passengers would have to self-identify the need for assistance prior to arrival at the airport. If a phone system or "help station" approach is used upon arrival to the curb, the coordination between the airlines would need to be considered in order to meet demands and service levels. We recommend a working group to review further.

Reporting, monitoring and compliance

1. *Please describe any significant challenges you might face in publishing:*
 - *multi-year accessibility plans; and*
 - *Reports on accessibility complaints received by your organization.*

YVR Response: Vancouver Airport Authority does not foresee a significant challenge publishing a high-level multi-year accessibility plan, on the condition that it is understood to be a framework only, considered a living document and subject to change. The Airport Authority also does not foresee a significant challenge publishing a high-level report on the number of complaints it receives

regarding accessibility, noting that many of the complaints received are related to service gaps by the airline rather than the airport facility itself.