



September 13, 2018

VIA ELECTRONIC MAIL

David Handera
Vice President, Stations, Properties, and Accessibility
Amtrak
1 Massachusetts Ave. NW, Room 648
Washington, DC 20001

Dear Mr. Handera,

The Transportation Taskforce for the Consortium of Citizens with Disabilities (CCD) writes in follow-up to the July 13, 2018 meeting Amtrak held with advocates representing passengers with disabilities. CCD is the nation's largest cross-disability coalition for organizations serving and representing the concerns of people with disabilities, and we were fortunate to have several of our taskforce member organizations present at the meeting.

We appreciate Amtrak staff and leadership setting aside time to meet, share updates and listen to our input. There are a number of improvements and updates we have been pleased to learn about over the course of this year's meetings. In addition, we find that we are carrying a growing list of concerns regarding cuts to staff and lines, fleet design and transparency. We ask that you reconsider changes that will have burdensome and negative impacts on service, and offer topics for discussion at future meetings.

Improvements Noted

We are pleased by the work to improve accessibility with the On-board Passenger Information Display System (OBIDS) screens on the Acela 21. We encourage staff to work with advocates to ensure the content displayed on the screens will be as accessible as possible. Continuing to partner with advocates will fine-tune ways that important technologies for passengers with sensory disabilities can be deployed.

We also are pleased by the additional Americans with Disabilities Act (ADA) stations program and compliance efforts, though an increased pace is always warranted.

Concerns & Opposition to Cuts

We ask that you reconsider Amtrak's recent decisions to reduce the passengers with disabilities discount, the removal of station staff at many stations around the country, and proposed cuts to long distance rail lines. While these steps may be part of Amtrak's greater plan to increase revenue, it is important for Amtrak to know that these decisions will have significant and negative impacts on the lives of people within the disability community.

Reconsider Decreased Discount for Passengers with Disabilities

Ticket prices continue to remain steep along many routes, while many individuals with disabilities still find themselves on a fixed (low) income, unemployed, and do not receive the same level of service or experience as people without disabilities. Due to the design of Amtrak's fleet, especially on long distance routes, passengers who use wheeled mobility devices have a much more limited experience on board the train, being unable to get to the dining cars or use the Superliner lounges. Similarly, deaf and hard of hearing passengers on most of Amtrak's equipment lack the basic text information displays for next stop and other information that has become standard on new commuter trains.

Reconsider Station Staff Cuts

Staff have often been a helpful support for passengers without disabilities, when purchasing tickets, boarding and disembarking trains safely, transferring to and from Amtrak Thruway buses, and gaining access to other station amenities. Many low-income people with disabilities lack internet access and credit cards. Purchasing tickets in person at a station is their only option. As Amtrak continues its efforts to address station inaccessibility 28 years after the passage of the ADA, removal of staff creates additional and unnecessary obstacles for passengers.

Reconsider Proposed Cuts to Long Distance Rail Lines

We also note, and strongly oppose, proposed cuts to long distance rail lines. Cuts would create yet another barrier by breaking up service in a manner that limits travel, especially in rural areas and when combined with cuts in station staff.ⁱ

Improve Fleet Design & Transparency

We remain concerned regarding the current design of the Acela 21. We appreciate that Amtrak acknowledged the dismay of advocates regarding a leg for the table in the wheeled mobility device seating location. While there has been a change in the location of the table leg, there is still not a solution that would eliminate the table leg completely.

The development and introduction of the new train designs needs greater transparency from Amtrak and Amtrak's contractors. We encourage Amtrak to leverage its purchasing power with the contractors. It is much more expensive for Amtrak to retrofit trains due to a failure by the OEM to assure accessibility and equal access.

One of our aims in participating in these meetings is that Amtrak leadership will better recognize the value in engaging passengers with disabilities to identify issues with a new design *before* trains are pushed into production. Recent events surrounding WMATA's 7000 series Metro cars are a stark reminder as to the issues that can arise when there is a lack of transparency around building out accessible design.ⁱⁱ Amtrak, in working with its contractors, must not make similar mistakes.

Future Collaboration & Meetings

In recent meetings we have noticed a trend toward conveying information, and less opportunity to illicit collaborative insight. We seek more of a conversation between Amtrak, advocates, and passengers with disabilities, to identify where improvements could be made, and what pathways to greater universal design.

Training

While Open Doors is a well-known disability training organization, we would appreciate input into Amtrak's training materials for its passenger facing staff.

Emergency Management

We encourage Amtrak to share updates and seek input from customers with disabilities regarding train and station emergency preparedness and management plans.

Website and Mobile Application

We encourage Amtrak to seek input from those who rely upon assistive technology in order to access Amtrak's website and mobile application. During the Winter 2018 quarterly meeting the question was raised as to whether or not the upcoming website changes had undergone Section 508 compliance checks. No clear answer was given, and concerns have arisen during the usability of Amtrak's recently updated website.

Our organizations are hearing more complaints about systemic issues such as the choice to update the Amtrak Mobile App without including the ability of people with disabilities to identify their disability-related needs. It is important for Amtrak to understand that accessibility goes beyond train cars and stations. As a public transportation provider, full accessibility should exist throughout all facets of the organization.

Clear Timelines

We request clear timelines regarding new fleet, station and renewal fleet improvements, to better understand the development and eventual implementation of new plans. Set timelines will help all parties involved stay abreast of the progress that is being made. Time markers will hold Amtrak responsible for developing accessibility features, while requiring the disability community to remain involved and provide necessary and critical feedback. Time frames keep all parties accountable.

Accessible Train Travel is a Necessity

Train travel can be an alternative to other modes of transportation, a less stressful option in congested areas like the Northeast Corridor and parts of California, or for those not in a rush who wish to take in the scenic views of America's countryside. However, for many passengers with disabilities, train travel is not a luxury, but a necessity. Rail travel provides more space compared to air travel or other modes, allows wheelchair users to remain in their chairs and not be worried about costly and severely disruptive mobility device damage, may provide access to amenities such as accessible restrooms and outlets, and may be the only means of transportation between cities, especially in rural areas.

Thank you again for your engagement and ongoing communications. We look forward to continuing our conversations and remain grateful for the service you provide to millions every day. Please do not hesitate to contact Carol Tyson at ctyson@dredf.org with any questions.

Sincerely,

Consortium for Citizens with Disabilities Transportation Taskforce Co-Chairs

Dara Baldwin
National Disability Rights Network (NDRN)

Tony Stephens
American Council for the Blind (ACB)

Carol Tyson
Disability Rights Education & Defense Fund (DREDF)

CC: DJ Stadtler, Executive Vice President

ⁱ Irina Ivanova. "Trump Budget Plan for 2019 defunds Amtrak's long-distance routes." *CBS News*, February 13, 2018. <https://www.cbsnews.com/news/trump-budget-plan-for-2019-defunds-amtraks-long-distance-routes/>

ⁱⁱ Kery Murakami. "For blind Metro riders, it's about more than minding the gap." *Washington Post*, July 24, 2018, <https://www.washingtonpost.com/express/wp/2018/07/24/more-than-minding-the-gap/>