



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

Transportation Task Force

**Comments on the
US Access Board NPRM:
Accessibility Guidelines for Passenger Vessels
Docket number ATBCB-2013-0003
RIN: 3014-AA11
CFR Citation: 36 CFR 1196**

January 24, 2014

The Consortium for Citizens with Disabilities (CCD) Transportation Task Force is pleased to submit the following comments on the Access Board's NPRM on Passenger Vessels. The CCD Transportation Task Force is a coalition of national organizations which advocates on behalf of the transportation needs of people with a variety of disabilities, including developmental disabilities, mental illness, sensory disabilities, physical disabilities, and intellectual disabilities. The Task Force has the following recommendations for the final guidelines:

1. In general we encourage the Board to make sure that the guidelines cover the greatest numbers of vessels possible and that scoping reflects this. Specifically, we recommend that the size of ferry that is covered be as large as possible and at a minimum that it remains at the 150 passenger level. This is critical as ferries play a unique role in many communities and are critical to access employment, schools and community life for many individuals with disabilities. As a matter of civil rights, it is important for these guidelines to reach as far as possible.
2. We also ask that the guidelines cover tenders carrying 30 passengers or more. The scope of covered tenders should be large in order to make cruises and other activities on large vessels fully accessible
3. The language of the final guidelines should be understandable by individuals not familiar with maritime language, as many of the passengers on covered vessels would not be. For instance, coamings is not a term familiar to most lay people and someone who is looking for what their rights are may not be able to find the information they are looking for if they are looking for thresholds versus coamings. We recommend the final guidelines come with a glossary or some other guidance that helps people easily find the information they are looking for in order to know their rights.

Thank you for the opportunity to comment on the passenger vessel guidelines. If you have any questions or would like further information, please contact Patrick Wojahn at the National Disability Rights Network at 202-408-9514, x102, Carol Tyson at United Spinal (202) 556-2076 or Jennifer Dexter at Easter Seals at 202-347-3066.