



November 1, 2022
via Regulations.gov

Jodi L. Baker
Deputy Associate Administrator for Aviation Safety
U.S. Department of Transportation
1200 New Jersey Ave. SE, Room W12-140
Washington, D.C. 20590-0001

RE: FAA Request for Comments in Minimum Seat Dimensions Necessary for Safety of Air Passengers (Emergency Evacuation) Docket No. FAA-2022-1001

Dear Associate Administrator Baker:

The Consortium for Constituents with Disabilities (CCD) Transportation and Emergency Management Task Force Co-Chairs thanks the Federal Aviation Administration for the opportunity to provide its input on the request for comments in minimum seat dimensions necessary for safety of air passengers.

CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society free from racism, ableism, sexism, and xenophobia, as well as LGBTQ+ based discrimination and religious intolerance.

According to ShareAmerica, there are approximately 500,000 working service dogs in the United States. Under the Air Carrier Access Act (ACAA) regulations, service dogs are permitted to fly with their handlers. However, the shrinking size of airplane seats and accompanying foot space makes it more and more difficult for such dogs to travel easily and comfortably with their handlers. Comfort is not the only concern; the lack of adequate space can add to the time it would take to exit a row for a service dog handler and service dog in the event of an emergency evacuation.

Service animals are generally trained to curl up at the feet of their handlers. According to the ACAA's regulations, the dog is not supposed to intrude into the foot space of a neighboring passenger. Depending on the size and breed of the dog, the service animal may have to curl up very tightly to fit within the designated foot space of the service animal handler. As a result, little foot space is left for the handler. If a handler is tall, the

remaining room becomes even more sparse. Besides discomfort, such circumstances can pose greater problems if an emergency evacuation is necessary.

Since aviation deregulation there has been a significant reduction in the pitch, the distance between the back of one passenger's seat and the back of the front passenger's seat. Reduced pitch and limited width of airplane seats cause the handler's feet and the service animal to often become entangled.

When a service animal and handler enter or exit a row of seats that is not a bulkhead row, they must take turns. The handler will usually enter first and the service dog will follow and will curl up by the feet of the handler. When exiting, if the service animal team is in a middle or window seat, they must wait for the other passengers to exit and the handler must either first let the dog out and then follow the dog out or the handler must step over the dog with almost no room to do so and then have the dog follow through the narrow space.

This process is already difficult in a non-emergency situation when vacating a plane. This process could become extremely dangerous when a passenger and their service animal need to evacuate the plane quickly. Consequently, the pitch of each seat and the width of each seat must provide adequate space for service animal users to safely evacuate a plane in an emergency.

Additionally, with non-emergency boarding and alighting from an aircraft, wheelchair users must be transferred from their own wheelchairs onto a narrow aisle boarding chair to travel down the aisle of a commercial airliner. Depending on the wheelchair user's disability, they may require physical assistance to transfer from the aisle chair onto the aircraft seat. The airline or airport personnel who assist in these transfers need to be able to stand in the narrow space between the rows of seats and at the same time have enough room to be able to assist the wheelchair users in the transfers. Many wheelchair using passengers cannot feel when parts of their bodies strike parts of the seats during this transfer process and experience injuries while being transferred.

We do not know what procedures airline personnel are trained to use when assisting passengers with mobility disabilities during an emergency evacuation. Whatever process they use, the limited space between rows along with the narrow seats will undoubtedly make assisting passengers with mobility disabilities more challenging. More space between rows will provide airline personnel more options in assisting passengers with significant mobility disabilities in emergency evacuations.

Thank you again for the opportunity to comment on this important topic. If you have any follow-up questions, please reach out to Claire Stanley, Public Policy Analyst, at Claire.stanley@ndrn.org, or (202) 567-3501.

Sincerely,

CCD Transportation and Emergency Management Task Force Co-Chairs

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