



October 24, 2019

Via electronic mail

Elaine Chao
U.S. Secretary of Transportation
Office of the Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

RE: USDOT Access and Mobility for All Summit

Dear Secretary Chao,

The Consortium for Citizens with Disabilities (CCD) Transportation Task Force co-chairs write to thank you for holding the October 29th Access and Mobility for All Summit. 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.

Nearly 1 in 5 people in the U.S. has a disability (more than 57 million). While mobility has improved since the passage of the Americans with Disabilities Act, significant barriers remain across modes. As you know, access to transportation is necessary for people with disabilities to access employment; lead, contribute to and participate in their communities; support and spend time with family and friends; decrease isolation; and live their lives to the fullest.

The CCD Transportation Task Force recently compiled surface transportation priorities, attached for reference. We are providing this document in hopes that it may be useful during discussions and in case any clarification is needed ahead of time. Of note, the Task Force supports:

- Public transit and identification of transit and paratransit deserts;
- Fully accessible and integrated autonomous vehicle (AV) and on-demand mobility services, and anti-discriminatory passenger licensing policies that ensure access for all;
- Accessible infrastructure, including accessible bus stops and sidewalks, curb drop-offs and pick-ups, and sensible micromobility practices that ensure safe access to the public right of way; and
- Addressing continued discrimination across modes, including new mobility.

We ask you to consider the impacts Transportation Network Companies' (TNCs) service has had on mobility for travelers with disabilities. While TNCs have dramatically improved mobility for many ambulatory disabled passengers, full accessibility has largely been an afterthought. Denial of service for wheelchair and service dog users remains a significant barrier and violation of

rights. In addition, there remains limited availability of wheelchair accessible vehicles.¹ This is especially problematic when cities, states and transit agencies cut service hours or lines, partner with TNCs, solely, to provide transportation options to the public;² are relied on during emergencies and shutdowns, and when automated vehicles are likely to be provided through TNCs and a TNC model. Autonomous vehicles will need to ensure fully accessible service, through provision of anti-discriminatory licensing policies, wheelchair accessible vehicles, and accessible human machine interfaces that allow people with sensory and cognitive disabilities to ride.³

In addition, we note our NHTSA comments submitted August 28, 2019, and FMCSA comments submitted July 29, 2019. Consideration of Federal Motor Vehicle Safety standards, both for crash avoidance and crashworthiness, must take into account the needs of disabled pedestrians and passengers. When considering freight automation, employment of disabled individuals should be supported, and, unnecessary commercial drivers' licenses requirements and discriminatory testing guidelines should be repealed.

Finally, we ask you to prioritize accessibility and equity. Ensuring access for people with disabilities also requires access for low income communities, and those protected by Title VI requirements.

Thank you again for holding the Summit and for your commitment to access and mobility for all. Please do not hesitate to contact Carol Tyson, ctyson@dredf.org, Claire Stanley, cstanley@acb.org, or Lee Page at leep@pva.org with any questions. We look forward to working with you and your staff to advance the conversation and ensure access and mobility for all.

Sincerely,

Consortium for Citizens with Disabilities Transportation Task Force Co-Chairs

Claire Stanley
American Council of the Blind

Lee Page
Paralyzed Veterans of America

Carol Tyson
Disability Rights Education and Defense Fund

¹ Molly Taft. Why can't Uber and Lyft be more wheelchair accessible? *CityLab*, December 11, 2018. <https://www.citylab.com/transportation/2018/12/ride-hailing-users-disabilities-wheelchair-access-uber/577855/>

² Government Accountability Office. Public Transit Partnerships: Additional Information needed to Clarify Data Reporting and Share Best Practice Practices, July 2018. <https://www.gao.gov/assets/700/693518.pdf>

³ Please refer to the CCD Autonomous Vehicle Principles, Legislative Priorities, and August 23rd, 2019 feedback for further detail and concerns.

Enclosures:

CCD Transportation Task Force Surface Transportation Legislative Proposals and Priorities

CCD Transportation Task Force Autonomous Vehicles 3.0 Principles

CCD Transportation Task Force AV Legislative Priorities

CCD Transportation Task Force Response to Request for AV Legislative Feedback

CCD Transportation Task Force FMCSA-2018-0037-0136 Comments

CCD Transportation Task Force NHTSA NHTSA-2019-0036-0026 Comments

CC: Finch Fulton, Deputy Assistant Secretary for Transportation Policy

James C. Owens, Acting Administrator, NHTSA

K. Jane Williams, Acting Administrator, FTA

Vince Valdes, Associate Administrator for Research, Demonstration and Innovation, FTA