

July 5, 2007

TO: Chairman Gibbons and Commissioners

FROM: Alfred H. Harf
Executive Director

RE: Architectural and Transportation Barriers Compliance Board's Draft
Revisions to the ADA Accessibility Guidelines for Buses and Vans and
PRTC Comments

On April 11, 2007, the Architectural and Transportation Barriers Compliance Board ("the Board") published draft revisions to the ADA Accessibility Guidelines for Buses and Vans, in the federal register. The draft revisions have created quite a stir in the transit industry, prompting a multitude of critical reactions. The Board may have anticipated this in deciding to invite reactions before the start of formal rulemaking, and that's a good thing because it affords more than one opportunity for the Board to account for all the points-of-view on this important public policy matter.

This is the first time since 1991 that the Guidelines, as they apply to vehicles, are being proposed for revision (other than a solitary revision made in 1994 to incorporate over-the-road buses in to the Guidelines), and the changes as written are profound. Of greatest significance to PRTC are changes that would: (1) eliminate the definition of a standard wheelchair; (2) mandate automated bus stop announcements; and (3) mandate minimum dimensions for a "clear path" between the bus boarding location and the wheelchair securement area (which does not appear doable for most buses currently in service).

In light of the significance of these proposed revisions, I have submitted comments to the Board urging alterations as described. The draft revisions, my comments, and the comments submitted by the American Public Transportation Association (APTA) appear here as attachments one, two, and three, respectively.

Attachments: As stated