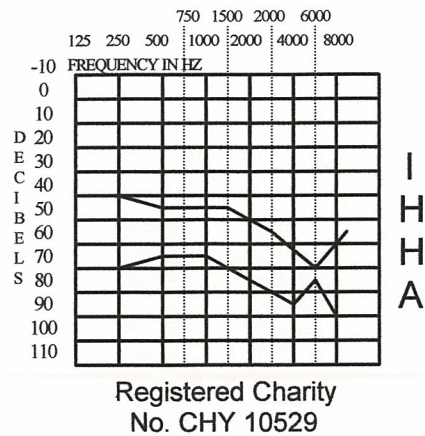
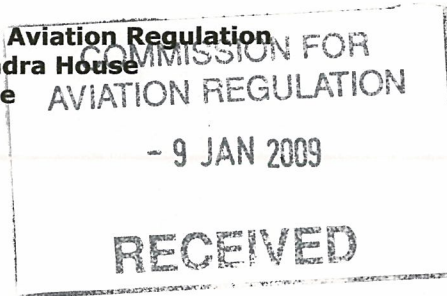


## *Irish Hard of Hearing Association*

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07 Jan 2009

Response to Notice on PRM charges at Dublin Airport. – 8/12/08

## **Response to Commission for Aviation Regulation**

### **Notice on PRM charges at Dublin Airport.** **Commission Notice 5/2008** **8<sup>th</sup> December 2008**

The present Issue as perceived by the Irish Hard of Hearing Association relates to cost of services from OCS (One Complete Solution) and lack of consultation with airlines or AOC (Airline Operators Committee) and DACC (Dublin Airline Consultation Committee).

Services provided by OCS would appear to us (IHHA) to be totally for people with reduced mobility (wheel chair users) rather than those also covered by the description "disabled"

We in the IHHA understand the term Disability as per Disability Act 2005 to be as follows: -

#### **Important terms defined in the Act (section 2)**

**"disability"**, in relation to a person, means a substantial restriction in the capacity of the person to carry on a profession, business or occupation in the State or to participate in social or cultural life in the State by reason of an enduring physical, **sensory**, mental health or intellectual impairment.

(Guide to Disability Act 2005)

It may be appropriate to outline what hearing loss is.

Helen Keller (victim of acquired deaf/blindness after illness at an early age) put it succinctly, when she said "blindness separates people from things but deafness separates people from people".

## **Needs of hard of hearing passengers travelling by air.**

The Irish Hard of Hearing Association (IHHA) is a voluntary body of charitable status in partnership with DeafHear.ie (formerly the National Association for the Deaf (NAD)).

We (IHHA) have been lobbying over the past good few years for a better deal in a lot of areas. The advent of the Disability Act and the Equal Status Act gave us the opportunity to be accounted for. We were pleased to be invited on to the DAA User Group in 2005 and have attended many meetings.

### **Disability as experienced by people with an acquired hearing loss while using airports leads to: -**

- 1) Failure to understand speech and therefore instructions at the check in desk and later from PA announcements while on the premises.....
- 2) Misunderstanding of vocal communications creating confusion regarding flight departure time alterations and changes in gate numbers without a visual confirmation (captions)...

There is another dimension here which is the denial of **access to information**.

Communicating with deaf or hard of hearing passengers face to face is not always feasible.

The alternative is communication in visual form **signage** (pictures) or **text** (captions).

Disability training should be for front line staff but should also be for everyone in the organisation from those at the top who make decisions to those in the front line.

The first measure is a simple one; the signage should be clear and plain. Clear speech or signage averts the need for enquiry. Some people with hearing loss do not have distinct speech, so this dilemma is avoided with good signage.

The great majority of people with hearing loss don't have total loss, so slow clear speech is vital in assisting their skills in lip reading when dealing face to face.

People with a total hearing loss or a severe loss are in the minority. However 17% of the population has a significant hearing loss and their needs are vital especially if travelling alone.

**The Loop System** is a wire around a room or an area which shuts out the background noise and enables people with a T switched hearing aid to hear more clearly. Background noise makes it very hard for someone with poor word discrimination to hear clearly.

If that noise is reduced, or eliminated by use of the loop system, it becomes quite easy for someone with a severe hearing loss to hear announcements.

Dublin Airport used to have blanket cover for loops but now has designated areas well signed. The need for a visual alert prior to the announcement is still important as it takes time to switch to T and frequently the announcement is half finished or over by the time the hearing aid is ready for reception!

When communicating information to a person with a hearing loss, it shouldn't be solely in oral form; it should be in text or visual, as on monitors or those having rolling scripts.

This is particularly important when there are changes at the last minute; hard of hearing people should get the same information as those without a hearing loss.

Airports should be well equipped with monitors to communicate information to people with a hearing loss.

In Emergencies, it's vital that people with a hearing loss are communicated with directly and quickly. Announcements should not only be in oral form but again conveyed in textual form.

Fire alarms when activated should have flashing lights (of a different frequency to the announcement signal) to alert people with hearing loss. These people do not hear acoustic alarms.

These facilities should be available for people with a hearing loss, not only at the airport but also on board the 'plane.

We in the IHHA have been frequently made aware that the airport is responsible for services provided as far as the boarding gates only and that the individual airlines are responsible for services from the boarding gate to the disembarkation gate at the next or destination airport.

Dublin Airport already promotes awareness and usage of these facilities. The ownership is as much on the service-provider as with the people with disabilities to inform themselves about these facilities.

People should be aware of their rights. If they have a complaint how do they pursue it and how far can they go?

This is one of the provisions in the directive on the rights of people with disabilities when travelling by air. If they don't get satisfaction with the airline, there should be another body to go to.

Maybe the Commission for Aviation Regulation being also the National Enforcement Body can give us some direction here.



**3. The Commission is designated as the body responsible for the enforcement of the Regulation (including the implementation of Article 8) as regards flights departing from or arriving at airports situated in the State. This is a function of the Commission under the Act.**

**4. (1) The Commission may issue general directions to air carriers, their agents, tour operators or the managing bodies of airports in relation to compliance with the Regulation.**  
(SI No. 299 of 2008)

Regarding the queried price for PRM charges at Dublin airport.....

**(8) Assistance should be financed in such a way as to spread the burden equitably among all passengers using an airport and to avoid disincentives to the carriage of disabled persons and persons with reduced mobility. A charge levied on each air carrier using an airport, proportionate to the number of passengers it carries to or from the airport, appears to be the most effective way of funding.**  
(EC 1107/2006)

...it would appear that some misunderstanding has occurred between major parties.

We in the Irish Hard of Hearing Association hope very much that a solution will be speedily arrived at.

As a frequent flier myself, I can say that my path through Dublin Airport has been better facilitated over the past year than previously.


The airlines already pay airport charges and these are passed on to their passengers.

If the airlines are prepared to pay for facilities for those requiring mobility assistance they in turn can gain from this.

Re transparency and cooperation regarding tendering for the service for PRMs it is not in the remit of the Irish Hard of Hearing Association to judge.

We hope that our own requisitions and expectations from the DAA as per the enclosed report from the IHHA AGM 2008 will be honoured.

Yours very sincerely,



Freda Keenan

Vice President

Irish Hard of Hearing Association

7<sup>th</sup> January 2009

## **Dublin T2 Disability Users Group Consultation No 5**

2nd October 2007

### **For IHHA AGM 2008**

Freda and I attended the meeting which started late. Liz Moore apologised for the lack of a SpeedText person. The person who was to turn up failed to do so.

The meeting was a summary of the four previous ones.  
Points of interest for us HoH people were as follows.

#### **Environment, Design of equipment.**

Pass machines, phones and Fit-out shops:- Tenants will fit out as laid down in the Concessionaires Handbook and Tenants Rules compiled by design to DAA approval.

#### **Symbols**

There will be two signs used for deaf and hard of hearing persons.

For the Deaf it is similar to the loop sign without the T - the HOH one is the standard Loop sign with the T.

#### **Communication systems –**

Designated Point of Arrival.

There is a Telephone (Textphone) link to disability service provider.

Handsets are suitable for hard of hearing people.

Induction loop phones available.

Freda asked if there could be a flashing light before announcements. She pointed out that by the time a person could switch on their T Switch all or most of the announcement was completed.

#### **Building Acoustics & Service Noises.**

Buildings will have good insulation and internal acoustics to conform to good practice. Internal acoustic control measures. Services noise to be controlled and unlikely to be noticed.

#### **Communications Systems –**

##### **PAVA**

Public Address is provided by Voice Alarm system. The VA system - audibility and intelligibility of speech will be to International Standards. It will be used for flight passenger information. Allow local announcements. Health and Safety, Evacuation, announcements. Link to forecourts system (if required) PA announcements will be restricted to trained staff.

#### **Audio Frequency Induction Loops (AFILS)**

Induction Loops will be used to offer an alternative means of receiving PA announcements to T Switch hearing aid users. These Loops will be strategically placed at well signed locations. This approach focuses on providing and managing a good sound in the designated areas rather than "Blanket" coverage.

(AFILS) Audio Induction Loop Locations

A loop will be located at the following locations: -

Check-in designated areas.

Departure and central search - designated areas.

Departure lounge - designated seating areas.

Pier E departure gates - designated seating areas.

Pier E arrivals - designated areas.  
Transfer routes - designated areas.  
Reclaim hall - designated areas.

Arrivals - designated seating areas.  
Check-in-queues (between 2m and 6m from check-in-desk).  
Immigration queue. CBP queue area.  
Further designated seating in Food and Beverage Retail areas will be provided in line with the concessionaires requirements

Audio Frequency Induction Loops (AFILS)  
Other AFILs not connected to the PA system Secure Counter Voice Transfer Systems:  
1X Immigration booth, 1X CBP booth. On open-face desks: Information desk,  
Designated area at Central Search.  
Clear signs will indicate the availability of this system.  
These local systems will not carry signals from the PA.

Communication Systems - Help Point  
Telephone connection to OCC, Handset suitable for use by Hard of Hearing people,  
Induction Loop

Communications Systems - Public Telephones  
1 in four public telephones is to be accessible (at least 1 accessible phone per any group of public phones)  
Mounted at lower height for wheel chair users.  
Handset suitable for hard of hearing people, Induction Loop, Textphone.  
Public telephones are provided by concessionaires to DAA requirements

Communication Systems - Calls for assistance alarms  
Call for assistance alarm to each accessible WC. Call for assistance alarm to baby change facilities.  
The alarm will provide both audible and visible warning signals directly outside each WC and remote alarms will be reported back to the operations control room.  
Call for assistance alarms alert staff in the OCC to dispatch assistance as necessary.

I asked Liz Moore about the check-in desks in T1 and she said that it was being investigated and pointed out that there could be problems from the computers. I believe if T2 can surmount these problems then T1 should too.

Mick Costello  
IHHA  
October 2007