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Disabled People of Clare Ltd

Commission for Aviation Regulation

Dear Sir/Madam

17.12.08

Disabled People of Clare Ltd is alarmed to discover that there is some dissatisfaction among the airlines with the recent changes on accessibility at Irish Airports to comply with Regulation (EC) No 1107/2006.

While these recent changes are welcome, they merely represent a first step in making air travel fully accessible to disabled people.

Disabled People of Clare Ltd (DPOC) entered the consultation process on improved access facilities at Shannon in good faith with the management of Shannon Airport.

That good faith has been rewarded by the speed and quality of the improvements made by management at Shannon.

Briefly the improvements at Shannon are

- well signposted assistance desk in the terminal building with well-trained staff,
- adequate parking & assistance points in the short-term and long-term car parks,
- assistance points in car parks can communicate with assistance desk in the terminal building
- equipment such as wheelchairs and ambilift,
- accessible pathways and entrance to terminal,
- lifts and accessible movement within the terminal

The idea behind these improvements is that a passenger with reduced mobility can have the same access to services at an airport as people with no mobility problems.

It is incomprehensible to members of Disabled People of Clare Ltd that there is a campaign to row back on these basic improvements.

In the original consultation document from DAA it was requested "that remarks from (disability) organizations would be framed with reference to the "airline business model" in particular respecting "minimising turnaround time."

In the spirit of that framework and in order to demonstrate good faith and a spirit of cooperation, disabled people agreed to the second preferred method of choice for wheelchair users to board an aircraft, namely the "ambulift". This method of transfer is safe, comfortable, dignified, and efficient for service users, and fulfills all of the "business" criteria for air carriers as outlined.

It is worth noting that in all consultations with disabled people, the use of an airbridge is by far the preferred method of boarding an aircraft.

There are many further improvements needed to make full accessible air travel a reality, e.g. movable arm rests on aisle seats, accessible toilets on board large aircraft, safe storage of electric wheelchairs, seating for companion travellers etc.

Disabled People of Clare Ltd believes that the airlines need to continue to work on improving access to air travel for disabled people, not row back on the first positive steps taken to date.

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