

Accessibility Plan

2012 - 2025

London Transit... Wherever life takes you

TABLE OF CONTENTS

I.	Executive Summary	
II.	London Transit Profile – Accessible Public Transit Services	Page 1
III.	Prior Years Accessibility Initiatives	Page 3
IV.	Methodology for Annual Update	Page 8
V.	Process For Managing, Evaluating And Taking Action On Customer Feedback	Page 9
VI.	Process For Estimating The Demand For Specialized Transportation Services	Page 11
VII.	Steps To Reduce Wait Times For Specialized Transportation Services	Page 15
VIII.	Procedures For Dealing With Accessibility Equipment Failures	Page 16
Appe	ndix I	
	London Transit 2012-2025 Accessibility Work Plan	
Appe	ndix II	
	London Transit Accessible Customer Service Policy	
Appe	ndix III	
	Other London Transit Accessibility Policies	

SECTION I - EXECUTIVE SUMMARY

This report serves as the first thirteen year plan, established in compliance with requirements in Regulation 191-11 (Integrated Accessibility Standards Regulation or IASR), noting, prior to this plan, LTC submitted annual plans in compliance with the Ontarians with Disabilities Act.

The plan sets out specific strategies to address local accessibility issues and regulatory requirements over the next five year period, noting the two may be at odds with one another. Further, the plan includes discussion and tentative timelines with respect to the regulatory requirements with compliance dates subsequent to 2017. The plan was developed with input from the LTC's Accessible Public Transit Service Advisory Committee, as well as consideration of input from customers via the customer contact system.

London Transit Commission is committed to:

- the continuous development of accessible public transit services;
- working toward ensuring its facilities are barrier free;
- working toward providing barrier free employment and employment opportunities; and
- establishing communication services that respect the abilities of all customers, employees and the public at large.

The activity undertaken in previous years is reflective of the continued progress in advancing to the goal of full accessibility in service, facilities, employment and communication. The Commission's commitment is based on making balanced, measured and sustainable progress consistent with its business planning process and financial and operational capacity.

In addition to providing a brief update on prior year's activity, the following report includes a work plan that addresses all regulatory requirements as established under the Accessibility for Ontarians with Disabilities Act. Linking the accessibility plan initiatives to the LTC business planning process provides the mechanism to chart progress in identifying and removing existing barriers, and safeguarding against new barriers being created and ensuring gains are sustainable.

Consistent with the IASR requirements, annual public consultations will be held to discuss progress toward the goal of full accessibility. Subsequent to those sessions, an annual report will be prepared and posted on the Commission's website. The plan will be reviewed and updated at a minimum every five years, noting given the ongoing development of accessibility regulations under the Accessibility for Ontarians with Disabilities Act, updates may be required sooner.

Harold Usher Chair, London Transit Commission

SECTION II - LONDON TRANSIT SERVICES PROFILE

The London Transit Commission provides two public transit services; namely, conventional transit and specialized transit services. The respective profiles are as follows:

Conventional Transit Service – 2011 Service Profile

Type of service	Fixed route - modified	d radial service
Service Area		ity of London boundaries ds into new City boundaries
Hours of service	<u>Day</u> Monday to Friday Saturday Sunday Statutory Holiday	<u>Times</u> 6:00 a.m. to 12:00 p.m. 6:00 a.m. to 12:00 p.m. 8:30 a.m. to 11:00 p.m. 8:30 a.m. to 11:00 p.m.
Annual passenger trips	22.4 million	
Annual revenue service hours	548,000 hours	
Annual kilometers	11.596 million	
Number of routes	31 routes identified as	nmunity bus operations s accessible (i.e. utilizing low floor buses) as having bike racks on all buses
Types of services		- 10 routes – 9 of which are e with low floor accessible buses
		 4 routes, all of which are with low floor accessible buses
		 – 10 routes, 10 of which are e with low floor accessible buses
	Feeder/local – 9 route with low floor accessi	es, 6 of which are designated to operate ble buses
		outes, all of which are e with low floor accessible buses
Fleet make-up	Approved fleet size o accessible by Decem	of 192 buses of which 164 were low floor ber 31, 2011

Specialized Transit Services – 2011 Service Profile

Type of Service	Shared Ride – Door to Service	Door – Pre-Booked
	advance. Trips, with th	b book trips three days in ne exception of subscription trips, come first serve basis. There is availability.
Service Area	Within new City of Lon annexed areas)	don boundaries (i.e. includes the
Hours of Service	<u>Day</u> Monday to Friday Saturday Sunday Statutory Holiday	<u>Times</u> 6:00 a.m. to 12:00 p.m. 6:00 a.m. to 12:00 p.m. 8:30 a.m. to 11:00 p.m. 8:30 a.m. to 11:00 p.m.
Registrants	4,022	
Annual eligible passenger trips	227,600	
Attendant/companion trips	27,300	
Annual service hours	102,600 - includes bot service providers	h primary and secondary
Fleet requirements	secondary service pro provider operates 23 v	e provided by primary and viders. The primary service vehicles, while the number of he secondary service provider o demand and budget.
Service Administration	Service booking - han annually for trip bookir	dling in excess of 200,000 calls ng, cancellations, etc.
	primary and secondary between 20 and 25 ve	roviding daily schedules for y service providers consisting of hicles per day during peak 196,000 plus trips on an annual
	Dispatching service – of service.	deals with "real-time" monitoring

SECTION III – PRIOR YEARS ACCESSIBLITY INITIATIVES

Conventional Transit Service Plan – Accessibility Initiatives

Accessible Bus Stops

At December 2011, 1,951 (89.6%) of the 2,176 stops in the system are considered accessible. Of the remaining 225 stops:

- 145 stops do not currently have landing pads and do not have adjoining sidewalks (6.7% of all stops)
- 63 stops have landing pads but do not connect to the adjoining sidewalk (2.9% of all stops)
- 18 stops have site issues (e.g. grade, set back, etc.) which prohibits them from being made accessible

Going forward, bus stops will be upgraded to accessibility standards as the City's sidewalk network is expanded, noting that in a very few number of situations, the provision of a connector pad to the sidewalk network is not feasible due to physical limitations. In these situations, the stop will be marked as not being accessible and the nearest accessible area will be used to provide service to passengers (e.g. driveways) requiring an accessible stop.

Given the City of London is responsible for the construction of sidewalks, LTC Administration has confirmed all stop locations that have not been made accessible given the absence of a sidewalk, and will work in conjunction with City of London Administration to address these locations in a timely manner. Further, going forward, all stops added to the system will be made accessible as may be required assuming same are linked to the City's sidewalk system. This item has been included on the work plan in Appendix I.

Accessible Routes and Fleet

Transit routes are designated as accessible when all buses used on the route at all service times are low floor accessible buses and all stops (where possible) along the route are accessible (have a connecting pad from the stop area to the City sidewalk network, providing there is a connecting sidewalk and sufficient spacing to provide a connecting pad).

London Transit's conventional transit service is defined by 35 fixed routes and 3 community bus services. Of the 35 routes, 31 were designated accessible at December 31, 2011. The 3 community bus services are designated accessible services.

By the end of 2012, the LTC's fleet will be fully accessible, and all routes will be deemed accessible.

Smart Bus Technology Implementation

Over the past three years, LTC has been engaged in a process to upgrade/replace its Automatic Vehicle Location and Communication (AVLC) system, often times referenced as "Smart Bus Technology". The technology supports improved customer service and service delivery to all current and future customers. The total capital investment in the Smart Bus Technology initiative is \$6.5 million.

The features of the system, all of which are fully functioning as at December 2011, are set out below:

- automatic in-vehicle visual display of next stop location
- automatic in-vehicle audio announcement of next stop location
- automatic external audio announcement of route name, direction and destination
- tracking of in-service buses along routes via a Global Positioning System (GPS) which supports better service management
- automatic on-street information signs with real-time information on next buses noting, the signs are located at eight (8) strategic locations
- automatic passenger counters on 43 buses supporting better service plan
- Interactive Voice Response system providing real-time service information by route and stop location via telephone
- real-time schedule information via 'WebWatch' through LTC website

The implementation of the Smart Bus Technology has resulted in compliance with several sections of the Integrated Accessibility Standards Regulation well in advance of the compliance date set out in the Regulation.

Bus Stop Sign Upgrade Program

In 2011, the design and colouring of bus stop plates was reviewed in consultation with various stakeholder groups including the City of London, CNIB and LTC's Accessible Public Transit Service Advisory Committee in an effort to provide greater visibility and more comprehensive information relating to the stop. The final design includes:

- white on blue colour scheme
- bus pictogram
- stop identification number (identification link to IVR and WebWatch)
- routes servicing the stop
- service notes as applicable
- website
- customer service information

The bus stop plates are anticipated to be fully installed by the fall of 2012.

Summary of AODA Specific Work Plan Initiatives

Accessibility for Ontarians with Disabilities Act (AODA) - Standard Development

Throughout the AODA standard setting process, the transit industry at large and London Transit Administration have participated to various degrees. Subsequent to Standard approval, the industry has remained engaged with Ministry of Community and Social Services representatives to provide input into compliance guidelines and materials.

LTC Administration remains engaged in the process underway with respect to the Built Environment Standards through participation on the Association of Municipalities in Ontario (AMO) resource team.

LTC Administration will continue to be involved in any activities relating to the AODA to the extent opportunities remain available.

Integrated Accessibility Regulation – Regulation 191-11 (IASR)

On July 1, 2011, Regulation 191-11 came into effect, setting in place the related standard requirements dealing with Transportation, Employment, and Information & Communications under the AODA. The timelines associated with the requirements, as provided by Regulation, called for immediate compliance in some cases, as well a number of requirements had compliance dates of December 2011. Each of the aforementioned requirements is discussed in greater detail below, including the approach LTC employed for compliance. The requirements that are included in the 2012 work plan are also discussed later in this plan. The remaining requirements in the Regulation are identified on the Work Plan set out in Enclosure I, including a time period in which the requirement will be assessed and addressed, and any other commentary relative to the requirement.

At time of completion of this plan, a compliance reporting mechanism for the IASR has not yet been released by the government, no compliance forms have been filed on behalf of LTC.

Integrated Accessibility Regulation – Requirements for Compliance July 2011

Requirement 35 – Non Functioning Equipment

A detailed review of Section 35 indicated that current LTC practices are consistent and compliant with the requirements therein.

Requirement 39 – Transition of Existing Contracts

LTC did not have any outstanding contracts for the purchase of conveyances at the time of the Regulation becoming in force, and as such, is in compliance with this requirement.

Requirement 40 – Transition of Existing Vehicles

LTC does not have a retrofit program for older vehicles, and as such, is in compliance with this requirement.

Requirement 46 – Fares

The requirements set out in Section 46 are consistent with LTC's current fare policies and as such, LTC is compliant with this requirement.

Requirement 48 – Storage of Mobility Aids

None of the vehicles in LTC's conventional fleet have a designated area where mobility aids or assistive devices could be stored. As such, equipment of this nature remains in the possession of the customer during travel on conventional services. There is no fee associated with transportation of such equipment.

In regard to the vehicles utilized for the delivery of specialized transit services, all equipment of this nature is stored in the vehicle with the customer, and there is no fee associated.

LTC is compliant with this requirement.

Requirement 51 – Pre-boarding Announcements

LTC's smart bus technology provides for the automatic external announcement of the route name every time the conveyance doors are opened. Further, a led sign located just above and to the left of the front door provides the same information. LTC is compliant with this requirement.

Requirement 52 – On-board Announcements

LTC's smart bus technology provides for the automatic announcement and visual display of each stop along the route on all conveyances. For further information with respect to procedures during equipment failure, please refer to Appendix III. LTC is compliant with this requirement.

Requirement 68 – Origin to Destination Services

LTC employs a "family of services" approach to accessible public transit service delivery, which attempts to best match the service provided to the customer's needs. Included in this model is standard conventional service, community bus service, workshop shuttle service, and door-to-door service. LTC is compliant with this requirement.

Work Plan Initiatives – AODA Compliance

Subsequent to the release of the Integrated Accessibility Standards Regulation (IASR), the requirements were reviewed and prioritized based on compliance timeframes. Those requirements that were deemed to require changes to current operating procedures and possible employee training were given priority regardless of compliance dates in effort to mitigate the potential for repeated updates and training.

Once the priorities were set, LTC established working groups and project leads for each of the requirements set out in the Regulation. The project leads meet on a regular basis to discuss progress, and the senior management group reviews progress on a quarterly basis. The work plan set out in Appendix I provides detail with respect to each of the requirements.

The Ontario Public Transit Association has also led working groups for the transit industry to collectively work on compliance approaches to a number of requirements that were deemed to be best approached consistently across the Province versus one-off system approaches. The requirement in the IASR relating to the provision of courtesy seating was one such requirement. In this case, a working group was established to determine an approach to compliance that would be acceptable to all transit systems in the province. This approach results in the best outcome for the passengers in that the signage and communication strategy will be consistent across all systems.

London Transit will continue to participate on industry working groups associated with AODA compliance.

SECTION IV - METHODOLOGY FOR ANNUAL UPDATE

Annual Plan Update

The Accessibility Plan covers the period of 2012 – 2025, consistent with requirements in the Integrated Accessibility Standards Regulation (IASR). The plan was prepared in consultation with the Accessible Public Transit Service Advisory Committee and adopted by the Commission.

Consistent with IASR requirements, progress against the plan will be reported annually and made available to the public. The annual update will provide commentary with respect to the items included in the Accessibility Work Plan set out in Appendix I that have been scheduled to be addressed in the previous calendar year. Further, beginning in 2012, the Commission's Accessibility Plan will be included on the agenda for an annual public meeting(s), consistent with IASR requirements. The plan will be updated as required, but at a minimum of every five years. The following diagram depicts the process.



The key inputs to the plan and related annual update are:

- i) legislative requirements
- ii) customer feedback including annual public consultations and market surveys
- iii) Accessible Public Transit Service Advisory Committee

The LTC Accessibility Plan feeds directly in to the LTC overall Business Plan Process as well as annual operating and capital budget submissions.

SECTION V – PROCESS FOR MANAGING, EVALUATING AND TAKING ACTION ON CUSTOMER FEEDBACK

Feedback from customers can be generated by the customer or extracted by LTC. Generally, when LTC initiates the gathering of feedback, it is related to a specific issue. The methods for managing, evaluating and taking action with respect to each method are discussed in greater detail below.

Receiving Feedback (Customer Generated)

Feedback from customers (good, bad or indifferent) serves as key inputs to London Transit's service delivery and annual service plans, including those elements dealing specifically with accessibility.

Customer feedback with respect to both conventional and specialized services is directed to customer service representatives, who report to the Manager of Service Quality. A public contact form is generated to extend a compliment, to record a request and/or to register a complaint or comment. Contacts are received from passengers/public via the telephone, in person, mail and/or email.

At the time the contact is received, the customer is asked to indicate whether they would like to be contacted directly with a response. In all cases where a customer has indicated their desire for a response, and to the extent they have provided valid contact information, LTC staff contacts the customer.

In terms of compliments, all LTC employees who are identified in compliments received from customers are acknowledged in the LTC employee newsletter (The Communicator) for the quality customer service they have provided.

Requests received are generally with respect to service (actual service, bus stops, bus shelters, etc.) and are forwarded to the appropriate department for review and follow-up. In the majority of cases, the requests are summarized and included in the annual service plan review process undertaken by the Commission. In the event a request is something that can be acted upon outside of the service planning process, appropriate action is taken by LTC staff and the customer is advised accordingly.

Complaints are recorded, investigated to the extent necessary and forwarded to the appropriate manager for investigation and action as appropriate. Customers who request a response to a complaint will be advised that an investigation has taken place and the matter was dealt with accordingly; however, in accordance with privacy legislation and related London Transit policy, they will not be provided with any details with respect to personnel matters. In addition, an annual report which summarizes and discusses all customer contacts received in the prior year is presented to the Commission and made available to the public in January/February of each year. The report breaks down the contacts in a number of ways to provide further insight into the identified issues, on a prioritized basis, from a customer perspective.

In terms of conventional transit service contacts, they are broken down into sub-categories which include Equipment, Service Performance, Operator Performance, Service Development, Fare Policies, and Service Disruptions, and then compared in terms of number to that received the prior year. Customer contacts relating to the specialized service are broken down in a similar manner, with categories including Customer Service, Equipment/Amenities, Fares, and

Service Performance. This breakdown and comparison to previous years allows LTC to determine whether new programs and services have had an impact on customer contacts.

Gathering Feedback (LTC Generated)

LTC utilizes a number of methodologies to gather feedback from customers as identified in the table below.

	Servi	се	Торі	С	
Method	Conventional	Specialized	Specific	General	Frequency
Market Survey					
- direct surveys with users and non-users	\checkmark		\checkmark	\checkmark	As required
- direct phone survey to registered customers		\checkmark	\checkmark	\checkmark	Bi-annual
- online surveys via LTC website	✓	✓	✓	✓	As required
- on-board surveys	✓		✓		As required
Focus Groups	✓	✓	✓		As required
Community Workshops	✓		\checkmark		As required
Peer Consultations	✓	\checkmark	\checkmark	\checkmark	Ongoing
Town-Hall Meetings	\checkmark	\checkmark		\checkmark	Annual
Advisory Committees	\checkmark	\checkmark	\checkmark		Monthly

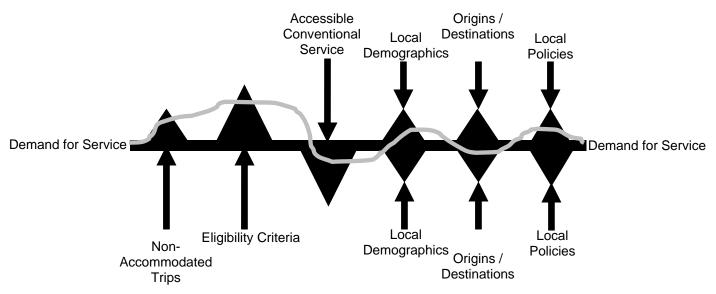
In the case of LTC generated input mediums, the data gathered is utilized to assist in making decisions with respect to the topic being researched.

SECTION VI – PROCESS FOR ESTIMATING DEMAND FOR SPECIALIZED TRANSPORTATION SERVICES

When attempting to estimate the demand for specialized services, there are a number of key factors that must be taken into consideration, all of which can vary in influence over time. These factors include:

- the number of trips the current service is unable to accommodate as requested. These trips are referred to as non-accommodated trips.
- the eligibility criteria for the specialized service, noting given requirements under AODA legislation, expanded criteria will be required in London to include those individuals with temporary disabilities.
- the level of accessibility of the conventional transit service offered. This includes accessible buses and stops and amenities as well as the areas of the city the service covers. This also includes the extent to which the service provider has implemented programs to encourage specialized transit customers to utilize accessible conventional service when possible as well as the level of service integration that exists between the conventional and specialized services.
- local demographics including but not limited to factors of age, disability, income etc.
- the location of key origins and destinations within the city and their proximity to one another. This includes senior homes, hospitals, rehabilitation facilities, medical offices etc., all of which tend to be primary origins and destinations for specialized transit customers.
- local policies and practices with respect to accessible transportation services including but not limited to the availability of accessible taxis.
- hospital policies with respect to outpatient treatments, dialysis unit scheduling and demand etc. noting these policies may be influenced by senior government program funding.

The following image depicts the impacts of the aforementioned factors on the level of demand for specialized services, noting at any point in time the magnitude of the impacts is subject to change, and as such, determining the level of demand for the specialized service is not a one-time event, but rather an ongoing exercise.



Non-Accommodated Trips

The manner in which the demand for specialized service is estimated is to measure the number of trips that could not be accommodated on the date and time which they were originally requested. These trips are referred to as "non-accommodated" trips. Adding these trips to the total number of trips provided will provide an estimated trip demand for a given time period. This measure provides an estimate based on the current registrant base for the service. The other aspect of estimating demand is the anticipated growth in registrants for the service, noting with each registrant added there is an accompanying need for access.

LTC measures non-accommodated trips by day, and summarizes same by month, and then by year. The daily non-accommodated trips can also be further broken down by time of day. This information is relied upon when making service enhancements or adjustments, in order to ensure that service is being provided during the periods of highest demand.

When preparing annual budgets and service plans, consideration is also given to the anticipated growth in registrants, which can be impacted by a number of factors. As the conventional service becomes more accessible, access to same for some of the customers relying on specialized service becomes an option, and as such, it should be expected that the demand for specialized services should decrease. However, as the population ages, so too may the need for specialized services. Requirements included in the Integrated Accessibility Regulation will result in increased demand for specialized services in many jurisdictions, including London, noting the requirement to expand eligibility criteria.

	2008	2009	2010	2011	% Change
Average Annual Registrants	3,256	3,632	3,886	4,022	24%
Total Service Hours	81,857	89,366	96,702	102,595	25%
Total Trips Provided	210,289	219,574	237,993	254,967	21%
Non-Accommodated Trips	9,194	8,203	5,995	5,968	-35%
Service Hours per Registrant	25	25	25	26	1%
Trips per Registrant	65	60	61	63	-2%
Non-Accommodated per Registrant	3	2	2	1	-47%

The table below provides a summary of the service hours, registrants and non-accommodated trips for the period 2008-2011.

The first section of the table clearly illustrates the growth that has occurred in the specialized service over the last number of years, both in terms of service as well as registrants. What is also clear is that the additional service that has been added is addressing the non-accommodated in part, but given the significant growth in registrants, there continues to be trips that are not accommodated.

The second section of the table reinforces the first section in that, both service hours per registrant and trips per registrant have remained consistent over the period. Of note, if the total non-accommodated trips in each year are viewed on a per-registrant basis, they average to only one per registrant per year in 2011.

Given that both conventional and specialized services are public transit services, delivered on a first come, first served basis, the rate of one non-accommodated trip per registrant per year is

relatively low. In comparison, the conventional transit service ceases to operate in many areas of the city after 7pm, and even more areas after 9pm, which results in many conventional transit customers being unable to utilize the service in the evening for their travel requirements. Depending on the area a customer resides, this inadequacy of conventional service could occur on a regular and frequent basis.

Eligibility Criteria

The other factor that will play a significant role in estimating the demand for specialized transit services in the future in London is the requirement for expanded eligibility criteria as set out in the Integrated Accessibility Standards Regulation.

The inclusion of customers with temporary disabilities in the eligibility criteria is anticipated to increase the registrant base for specialized services by up to 1/3 (or an additional 1,500 registrants). Associated with the anticipated increase in registrants are the trip requirements for each. Given the nature of a temporary disability, and the associated rehabilitation requirements for same, it is reasonable to assume that the trip requirements for these individuals will be greater than the current average registrant on the service. Assuming an additional 1,500 registrants that will require approximately 20% more trips than the current average customer will result in the demand for an additional 113,000 trips per year. Given the current service provides approximately 2.2 trips per hour, approximately 51,000 additional hours of service will be required.

As set out in the following table, London Transit is planning on significantly increasing the service hours for the specialized service in the next several years in order to accommodate this change in eligibility criteria.

Provisional Operat	-	-			12 to 20	16			
		ed Tran 2012		ervices 2013	2014		2015		2016
Description Provisional estimates (millions)		2012	4	2013	2014		2015	-	2016
Passengers, reserves and operating	\$	0.489	\$	0.519	\$ 0.584	\$	0.669	\$	0.760
Provincial gas tax funding		0.650		0.650	0.650		0.650		0.650
City of London		3.399		3.775	4.615		5.493		6.439
Total expenditure	\$	4.538	\$	4.945	\$ 5.849	\$	6.812	\$	7.849
Percent increase in Total Expenditure		10.1%		9.0%	18.3%		16.5%		15.2%
Revenue service hours		0.110		0.116	0.135		0.154		0.173
Percent increase in service hours		8.2%		5.4%	16.0%		13.8%		12.6%

Level of Conventional Service Accessibility

By the end of 2012, London Transit's conventional fleet will be 100% low-floor accessible, and all stops in the city that have adjoining sidewalk infrastructure and no impeding barriers will also be accessible. This milestone will provide the opportunity for service integration between the conventional and specialized services. It will also result in many more specialized trips being able to be accommodated on the conventional service, which should result in a decrease in demand, most notably in the period of April through November when snow and weather is not a barrier.

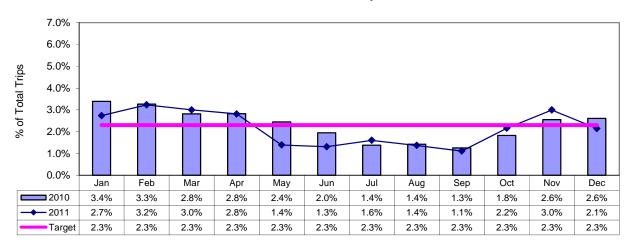
As set out in this plan, beginning in 2013, a much greater effort will be placed on diverting transit trips to the accessible conventional service where possible. In cases where the entire trip cannot be completed on the conventional service, options for integration will be assessed and implemented where practical. The plan calls for the integration of services to be well underway prior to the required expansion of eligibility criteria in order that the specialized service hours are not extended beyond what will ultimately be required.

Other Influencing Factors

As indicated earlier, there are many other local influencing factors that can impact the demand for specialized service. The most significant factor in London over the past number of years, which is anticipated to continue in the foreseeable future, is the demand associated with customers who are dialysis patients. These customers generally require treatment three times per week (312 trips annually). In 2011, there were 175 registrants (4% of total registrants) on the specialized service requiring dialysis treatments, which resulted in the demand for 54,600 trips (25% of all trips provided). Demand of this nature is the direct result of funding changes made in other Provincial Ministries, and as such the Ontario Public Transit Association will be calling on the government to review transportation funding provided to all ministries to ensure it is being allocated where it is needed most.

Determining Demand

Each year, the Accessible Public Transit Service Advisory Committee determines a performance target with respect to the level of non-accommodated trips it deems to be reasonable. Performance against this target is reported to both the advisory committee and the Commission on a regular basis. The graph below sets out the actual results for 2010 and 2011 as well as the target for 2012. The service levels included in the annual operating budget submission are consistent with what is estimated to be required in order to achieve the established targets.



Non-Accommodated Trip Rates

SECTION VII – STEPS TO REDUCE WAIT TIMES FOR SPECIALIZED TRANSPORTATION SERVICES

Specialized transit customers in London have identified on time performance as their highest priority in terms of the service in every customer survey completed. As such, trip schedulers place a significant emphasis on this when creating the daily schedules for service, ensuring there is adequate time for drivers to complete their daily schedule on time. However, given the number of mitigating factors that can influence service each day, it is not possible to guarantee that every trip will be delivered on time.

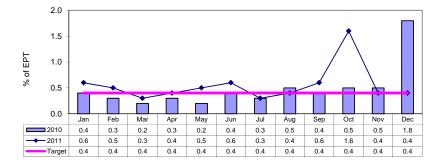
For the purposes of this report, wait times for specialized transportation services will be defined as the period between the scheduled time for pick-up and the actual time of pick-up. In London, this measure is tracked based on any trip with a pick-up that is greater than 30 minutes past the scheduled pick-up time, and is defined as a "pick-up over 30 minutes".

Each year the Accessible Public Transit Service Advisory Committee establishes a target for the number of pick-ups that will be in excess of 30 minutes past their scheduled time. Given the service is a shared-ride service, there are a number of factors that can influence performance against this target, many of which are not within the control of London Transit. These factors include, but are not limited to the following:

- traffic conditions, which can be significantly influenced by weather conditions, construction, delays caused by trains, accidents, etc.
- designated drop-off location issues (i.e. cars parked in designated drop off locations) which result in delays in dropping customers currently on-board the vehicle
- customers not being ready for their pick-up (i.e. dialysis patients not ready to leave, late medical appointments, etc.) which result in delays that can impact the rest of the day
- customers who do not take their scheduled trip, but don't cancel it (i.e. no-show trip) noting the policy is that drivers will wait 5 minutes past the scheduled pick-up time before leaving the pick-up location

Given the only way to ensure trips are provided on schedule (or reduce wait times) is to leave room in the schedule to allow for unforeseen delays, trip schedulers must be careful not to leave so much time that will result in other trips being non-accommodated and an ultimately inefficient service.

The graph below sets out the performance with respect to 2010 and 2011 pick-ups over 30 minutes as well as the target which has been established for 2012. It should be noted that the target of 0.4% of trips equates to approximately 3 trips per day.



Pick-ups Greater than 30 Minutes - Actual 2010 and 2011, Target 2012

SECTION VIII – PROCEDURES TO ADDRESS EQUIPMENT FAILURES

Fleet requirements are determined based on the number of vehicles required during peak operating times, plus those that will be subject to required inspections and maintenance. This is referred to as the spare fleet ratio. This ratio can vary significantly given factors such as the age and make-up of the fleet noting that while older buses may require higher levels of maintenance to keep them running efficiently, newer buses tend to have more electronics and features that are subject to failure.

There are a number of steps taken on a daily basis in an attempt to mitigate in-service break downs, including the following:

- Daily bus defect reports are turned into the garage by the Operator at the end of the day for follow-up by maintenance before buses are re-deployed.
- Every evening when buses are serviced (refueled, fare box emptied, etc.), employees also check that features of the bus appear to be in working order. In the event that an issue is discovered, the bus is either repaired that evening, or removed from service the following day until it can be repaired.
- Each day, prior to a bus leaving the garage for service, the Operator completes a "circle check", ensuring that the vehicle is functioning properly, this check includes the various accessibility features on the bus (ramp, kneeling feature, tie downs, etc.). Should any features be found to not be in working order, the Operator will attempt to have it repaired prior to going into service. If the bus cannot be repaired in time, an alternate bus is assigned to the Operator.

While the aforementioned steps should mitigate in-service breakdowns, they do not eliminate them. When a bus defect disables the bus while in service, the following steps are taken:

- The bus Operator contacts dispatch and relays the defect information.
- The Dispatcher determines the extent of the defect and whether the bus can be repaired in service.
- If the bus defect can be repaired in service, dispatch contacts the mobile mechanic and co-ordinates a timely repair.
- If the defect cannot be repaired in service, dispatch contacts maintenance who arrange for a replacement bus.
- If the bus cannot remain in service, the bus is taken out of service and a replacement bus is dispatched.

It should be noted that the procedures set out above may be impacted by severe weather or other vehicle issues that may result in the inability to replace all buses experiencing difficulty in service (i.e. severe winter conditions may impact the functionality of the ramp or kneeling features of the bus).

		L	.ondo	on Tr	ransi	t Co	mmi	ssior	n Aco	essi	bility	y Wo	rk Pl	an								
Sec #	Regulatory Requirement	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Compliance Deadline Date	SOP's	Training	Policy	Available to Public
	Regulation 429-07																					
3	Polices, Practices & Procedures									MPLI								Jan / 10				
4	Service Animals & Support Persons								CO	MPLI	ANT							Jan / 10				
5	Temporary Disruptions									MPLI								Jan / 10				
6	Training									MPLI.								Jan / 10				
7	Feedback Process									MPLI								Jan / 10				
8	Notice of Availability								CO	MPLI	ANT							Jan / 10				
9	Format of Documents								CO	MPLI	ANT							Jan / 10				
	5 Year Review																					
	Additional Requirements																					
	Regulation 191-11																					
	General						1															L
3	Accessibility Policies																	Jan / 13			✓	✓
4	Accessibility Plans																	Jan / 13				✓
5	Procurement																	Jan / 13				
6	Self-Service Kiosks																	Jan / 13				
7	Training																	Jan / 14		✓		
	5 Year Review																					
	Additional Requirements																					
	Information & Communications																					
11	Feedback																	Jan / 14			✓	✓
12	Accessibility Formats																	Jan / 15		✓	✓	✓
13	Emergency Procedure																	Jan / 12		✓		✓
14	Accessible Websites	1																Jan / 14				
	5 Year Review	1																				
	Additional Requirements																					
	Employment		•																	•		
22	Recruitment	1																Jan / 14			✓	
23	Assessment and Selection	1																Jan / 14			✓	
24	Notice to Successful Applicants																	Jan / 14			✓	

		L	ondo	on Tr	ransi	t Co	mmi	ssior	n Acc	essi	bility	/ Wo	rk Pl	an								
Sec #	Regulatory Requirement	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Compliance Deadline Date	SOP's	Training	Policy	Available to Public
25	Informing Employees																	Jan / 14			\checkmark	
26	Accessible Formats																	Jan / 14			\checkmark	✓
27	Workplace Emergency																	Jan / 12			\checkmark	
28	Individual Accommodation																	Jan / 14			\checkmark	
29	Return to Work																	Jan / 14			\checkmark	
30	Performance Management																	Jan / 14			✓	
31	Career Development																	Jan / 14			✓	
32	Redeployment																	Jan / 14			✓	
	5 Year Review																					
	Additional Requirements																					
	Transportation																	•				
34	Available Information																	Jan / 12				✓
35	Non Functioning Equipment																	Jul / 11	✓	✓		
36	Accessibility Training																	Jan / 14		✓		
37	Emergency Preparedness																	Jan / 12		✓	✓	✓
38	Fares, Support Persons																	Jan / 14			✓	
39	Vehicle Contracts								CON	NPLI	ANT							Jul / 11				
41	Accessibility Plans - Conv																	Jan / 13				✓
42	Accessibility Plans - Spec																	Jan / 13				✓
43	Accessibility Plans - Both																	Jan / 13				✓
44	General Responsibilities																	Jan / 12	✓	✓	✓	✓
45	Alternative Transportation																	Jan / 13				
46	Fares								CON	NPLI	ANT							Jul / 11				
47	Transit Stops																	Jan / 12	✓	✓	✓	
48	Storage of Mobility Aids								CON	MPLI	ANT							Jul / 11				
49	Courtesy Seating																	Jan / 12	✓	\checkmark	\checkmark	
50	Service Disruptions																	Jan / 13	~	\checkmark	\checkmark	✓
51	Pre-boarding Announcements																	Jul / 11	~	\checkmark	\checkmark	
52	On-board Announcements																	Jul / 11	~	\checkmark	\checkmark	
	5 Year Review																					
	Additional Requirements																					

		L	ondo	on Tr	ansi	t Coi	mmi	ssior	n Aco	essi	bility	/ Wo	rk Pl	an								I
Sec #	Regulatory Requirement	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Compliance Deadline Date	SOP's	Training	Policy	Available to Public
	Conveyance Requirements																		-	-	-	
53	Grab Bars									MPLI								Jan / 13				<u> </u>
54	Carpeted Surfaces									MPLI								Jan / 13				<u> </u>
55	Allocated Spaces									NPLI								Jan / 13				
56	Stop Requests									NPLI								Jan / 13				<u> </u>
57	Lighting									MPLI								Jan / 13				L
58	Signage									MPLI.								Jan / 13				L
59	Lifting Devices									MPLI								Jan / 13				
60	Steps									NPLI								Jan / 13				
61	Indicators & Alarms								COI	NPLI	ANT							Jan / 13				
	5 Year Review																					
	Additional Requirements																					
	Specialized Services																					
63	Eligibility Criteria																	Jan / 17			\checkmark	<u> </u>
64	Eligibility Process																	Jan / 14			\checkmark	\checkmark
65	Compassionate Grounds																	Jan / 14			\checkmark	\checkmark
66	Fare Parity								COI	MPLI	ANT							Jan / 13				
67	Visitors																	Jan / 13			\checkmark	
68	Origin – Destination								COI	MPLI	ANT							Jul / 11				
69	Co-ordinated Services																	Jan / 13				
70	Hours of Service								COI	MPLI	ANT							Jan / 13				
71	Booking																	Jan / 14				
72	Trip Restrictions																	Jan / 14			✓	
73	Service Delays																	Jan / 13			✓	
74	Companions & Children								COI	MPLI	ANT							Jan / 12			\checkmark	
	5 Year Review																					
	Additional Requirements																					
	Duties of Municipalities																					
78	General																	Jan / 13				
	5 Year Review																					
	Additional Requirements																					

		L	ondo	on Tr	ransi	t Co	mmis	ssior	n Acc	essi	bility	/ Wo	rk Pl	an								
Sec #	Regulatory Requirement	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Compliance Deadline Date	SOP's	Training	Policy	Available to Public
Non-	Regulatory Accessibility Issues																					
	Accessible Conventional Service																					
	Service Levels																					1
	Accessible Route Designation																					
	Accessible Stop Upgrades																					
	Bus Stop Sign Upgrades																					
	Specialized Service																					
	Service Levels																					
	Service Integration with Conventional																					
	Service Performance Targets																					
	Booking Window																					
	Policy Review																					
	Trip Duration Review																					
																						1

LONDON TRANSIT ACCESSIBILE CUSTOMER SERVICE POLICY

Contents

- 1. Purpose / Background Information
- 2. Application
- 3. Definitions
- 4. Policy Statement
- 5. General Principles
 - a. The Provision of Goods and Services to Persons with Disabilities
 - b. Communication with Persons with Disabilities
 - c. Notice of Temporary Disruptions in Services and Facilities
 - d. Assistive Devices and other Measures that Assist with Accessibility
 - e. Service Animals
 - f. Support Persons
 - g. Feedback
 - h. Training
- 6. Availability and Format of Documents Required by the Accessibility Standards for Customer Service (Ontario Regulation 429/07)
- 7. Notice of the Availability of Documents
- 8. Training of Agents
- 9. Supporting or Linked Policy/Procedure Documents
- 10. Link to Other AODA Standards

Accessible Customer Service Policy

1. Purpose / Background Information

The Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA") is a Provincial Act with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

Under the AODA, Ontario Regulation 429/07 entitled "Accessibility Standards for Customer Service" came into force on January 1, 2008. That Regulation establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public or other third parties.

This policy is drafted in accordance with the Accessibility Standards for Customer Service (Ontario Regulation 429/07) and addresses the following:

- the provision of goods and services to persons with disabilities;
- the use of assistive devices by persons with disabilities;
- the use of service animals by persons with disabilities;
- the use of support persons by persons with disabilities;
- notice of temporary disruptions in services and facilities;
- training;
- customer feedback regarding the provision of goods and services to persons with disabilities; and
- notice of availability and format of documents.

2. Application

This policy applies to all persons who deal with the public and those specifically designated, by contract to act, from time to time, on behalf of the London Transit Commission. This includes persons who are employees (full time, part time and/or on contract) and Members of the Commission and the Commission's Accessible Public Transit Service Advisory Committee.

3. Definitions

Assistive Device

A device used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the Customer Service Standard.

Commission

The London Transit Commission

Disability

Disability, defined to include:

a. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,

- b. a condition of mental impairment or a developmental disability,
- c. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d. a mental disorder, or
- e. an injury or disability for which benefits were claimed or received under the insurance plan established under the <u>Workplace Safety and Insurance Act, 1997</u>.

<u>Nurse</u>

A Registered Nurse or Registered Practical Nurse who is a registered member in good standing with the College of Nurses of Ontario.

Physician

A physician who is a registered member, in good standing, with the College of Physicians and Surgeons of Ontario.

Service Animal

Any animal used by a person with a disability for reasons relating to the disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or where the person provides a letter from a physician or nurse confirming that he or she requires the animal for reasons relating to his or her disability; or a valid identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school.

Support Person

A person who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, or medical needs or with access to goods or services.

4. Policy Statement

The London Transit Commission is committed to continuing to build, for all customers, an effective, efficient fully accessible public transit service

5. General Principles

a. The Provision of Goods and Services to Persons with Disabilities

The Commission will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- the Commission's services are provided in a manner that respects the dignity and independence of persons with disabilities;
- the provision of the Commission's services to persons with disabilities are to be integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a person with a disability to obtain, use or benefit from the Commission's services and,

• persons with disabilities are given opportunities equivalent to that of persons without disabilities to obtain, use or benefit from the Commission's services.

b. Communication with Persons with Disabilities

When communicating with a person with a disability, the Commission will do so in a manner that takes into account the person's disability.

c. Notice of Temporary Disruptions in Services and Facilities

The Commission is aware that the operation of its services is important to the public. However, temporary disruptions in the Commission's services and facilities may occur due to reasons that may or may not be within the Commission's control or knowledge. Reference to services includes both "on-road" services as well as ancillary services supporting the on-road service.

For the purpose of this policy statement, a "temporary disruption of service" is defined as a known or planned event that results in a deviation in regular service routing and/or schedule for an extended period of time, generally beyond one day. The known or planned nature of the event affords the Commission the opportunity to affect a revised service routing and/or schedule and provide timely communication to its customers.

The communication will include a reason for the disruption, the anticipated duration and a description of the alternative/amended routing and/or schedule as may be applicable. Such information will be provided from a menu of options, selected at the time as appropriate in the circumstances, giving consideration to time and duration. The options include:

- various news media (radio, paper, television)
- Commission website
- Commission Customer Service Staff; and
- posting of the appropriate notice either/or on-board the buses and at the affected bus stops

For all other occurrences of service disruption, the Commission, as considered appropriate in the circumstances, will make reasonable effort to advise the public of the disruption including information about the reason for the disruption, its anticipated duration, and a description of alternative/amended service if any, that may be available.

d. Assistive Devices and other Measures that Assist with Accessibility

A person with a disability is to provide their own assistive device for the purpose of obtaining, using and benefiting from the Commission's services. Exceptions may occur in situations where the Commission has determined that the assistive device (example segways) may pose a risk to the health and safety of a person with a disability or the health and safety of others on the services and/or at the premises.

In these situations and others, the Commission may offer a person with a disability other reasonable measures to assist him or her in obtaining, using and benefiting from the Commission's services, where the Commission has such other measures available. This includes having the person leave the assistive devices and sit in a passenger seat in the vehicle.

Persons with a disability are responsible to ensure their assistive device is operated in a safe and controlled manner at all times in accessing Commission services. This includes setting the brakes as appropriate on manual assistive devices (wheelchairs) or in the case of power assistive devices (chair or scooter) switching the power off.

Bus Operators are responsible for ensuring that wheeled mobility devices are properly secured, complete with the appropriate tie-downs and restraining devices and securely fastened before moving the bus. Should the passenger refuse to have his or her mobility device secured, the Operator will advise that it is mandatory for safety reasons. If the problem persists, the Operator will contact Dispatch and request assistance from an Inspector.

In the event that the passenger is traveling with an attendant who wishes to secure the mobility device the Operator must check to ensure the devices have been properly secured.

e. Service Animals

Service animals are permitted on the services and/or enter premises owned and operated, or operated by the Commission, noting such permission may be subject to presentation of the appropriate identification by the owner.

Pets are not permitted on the service nor on the premises.

It is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

f. Support Persons

A person with a disability may utilize the services and/or enter premises owned and operated, or operated, by the Commission with a support person and have access to the support person while on the service and/or on the premises.

The Commission may require a person with a disability to be accompanied by a support person while on the service and/or on the Commission premises in situations where, in the opinion of the Commission it is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises.

A support person, when assisting a person with a disability to use the Commission services, will be subject to the prevailing fare as defined in the Commission's fare policy, associated with the use of the services, noting the Commission's fare policy is subject to amendments from time to time.

g. Feedback

The Commission as provided by its' mission statement is committed:

To develop and maintain an effective, efficient and safe public transit service operating as a key component of a sustainable transportation system while being competitive, customer focused and financially responsible and providing a work environment that fosters accountability, pride, teamwork and job satisfaction. Feedback from the public is welcomed as it may identify areas that require change and encourage continuous service improvements. Feedback from a member of the public about the delivery of goods and services to persons with disabilities may be given by telephone, in person, in writing, in electronic format or through other methods.

Information about the feedback process will be readily available to the public and notice of the process will be posted on the Commission's website (<u>www.londontransit.ca</u>) and/or in other appropriate locations.

h. Training

The Commission will ensure that all persons to whom this policy applies receive training as required by the Accessibility Standards for Customer Service. The amount and format of training given will be tailored to suit each person's interactions with the public and his or her involvement in the development of policies, procedures and practices pertaining to the provision of goods and services.

The content of the training will include:

- a review of the purposes of the AODA;
- the requirements of the Accessibility Standards for Customer Service (Ontario Regulation 429 / 07);
- instruction on the Commission policies, procedures and practices pertaining to the provision of goods and services to persons with disabilities;
- how to interact and communicate with persons with various types of disabilities;
- what to do if a person with a particular type of disability is having difficulty accessing the Commission services;
- how to interact with persons with disabilities who use assistive devices or who require the assistance of a support person or service animal; and
- information about the equipment or devices available on the Commission premises that may help with the provision of the services to persons with disabilities.

Timeline for Training

The various training requirements are addressed through a variety of programs/initiatives using a variety of training approaches. Such training has and/or is provided as soon as reasonably practicable based upon an individual being assigned the applicable duties as well as on an ongoing basis as changes occur to the applicable Commission policies, procedures and practices governing the provision of services to persons with disabilities.

Records of Training

The Commission will keep records of the training, including the date on which training is provided and the number of individuals to whom it is provided. The names of individuals trained will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA").

6. Availability and Format of Documents Required by the Accessibility Standards for Customer Service (Ontario Regulation 429/07)

Recognizing its responsibility under various Federal and Provincial legislation, and the Commission's intent to fulfill its mandate in an open and accessible manner, the Commission supports the principles with respect to freedom of access to information and protection of personal information, as defined in the National Standard of Canada Model Code for the Protection of Personal Information (Can/CSA 830-96). The principles cover the areas of:

- Accountability
- · Identifying purposes of collection
- · Obtaining consent
- . Limiting collection to the purposes required
- Limiting use, disclosure and retention of personal information to that reasonably related to the stated purpose of collection
- · Accuracy in collecting and maintaining records
- · Safeguarding the information collected
- Being open
- Providing individual access
- · Addressing challenges regarding compliance.

Further the Commission designates the General Manager as being accountable on behalf of the Commission for the implementation of these principles in all aspects of the Commission's functions.

All documents required by the Accessibility Standards for Customer Service, including the Commission's Accessible Customer Service policies, procedures and practices, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to MFIPPA.

When providing a document to a person with a disability, the Commission will provide the document, or the information contained in the document, in a format that takes the person's disability into account.

7. Notice of the Availability of Documents

Notice of the availability of all documents required by the Accessibility Standards for Customer Service will be posted on the Commission's website, and available through the General Manager's office.

8. Training of Agents

Responsibility for training of independent contractors, selling the Commission's fare media is assessed as attached to the individual organization versus the Commission. The position recognizes the independence of the contractors, noting the selling of fare media is not an integral or essential part of the contractor's business and as such LTC does not exercise control over such businesses, the manner in which they conduct their business, nor in the training and monitoring of employees

9. Supporting or Linked Policy/Procedure Documents

- Standing Operating Procedures Conventional Transit Services
- Specialized Transit Services Policies and Procedures
- Commission Fare Policy/Program
- London Transit Commission Privacy Policy
- London Transit Commission Purchasing Policy
- London Transit Commission Mutual Respect Policy
- London Transit Commission Policy Respecting Ontario Human Rights

10. Link to Other AODA Standards

The Customer Service Standard policy statement herein described is subject to review and amendment from time to time as other common and sector specific standards developed under the AODA come into force.

London Transit Commission Accessibility Customer Service Compliance Report

1. a) Does your organization have policies, practices and procedures on providing goods or services to people with disabilities? [s. 3(1)]	Yes
1. b) Does your organization use reasonable efforts to ensure that these policies are consistent with the principles of independence, dignity, integration and equality of opportunity? [s.3(2)]	Yes
2. Do your organization's policies address the use of assistive devices by people with disabilities to access your organization's goods or services, or any available alternative measures that enable them to do so? [s. 3(3)]	Yes
3. Do your organization's policies, practices and procedures require your organization to take a person's disability into account when communicating with the person? [s. 3(4)]	Yes
4. Do members of the public or other third parties have access to premises that your organization owns or operates? [s. 4(1)] If no, then skip to question 7 below.	Yes
5. a) Does your organization permit people with disabilities to keep their service animals with them on the parts of your premises that are open to the public or other third parties, except where the animal is excluded by law, and is this included in your policies, practices and procedures? [s. 4(2) & (7)]	Yes
5. b) If a service animal is excluded by law from your premises, does your organization ensure that alternate measures are available to enable the person to access your goods or services (s.4.(3)]	N/A
6. Does your organization permit people with disabilities to enter the parts of your premises that are open to the public or other third parties with their support person, and provide notice of any fee charged for the support person, and is this included in your policies, practices and procedures? [s. 4(4) (6) & (7)]	Yes
7. Does your organization post a notice at a conspicuous place on your premises, on your website, or by another reasonable method, of any temporary disruption in facilities or services that people with disabilities usually use to access your organization's goods or services, including the reason, duration and any alternatives available? [s. 5(1) (2) & (3)]	Yes
3. Has your organization established and documented a process to receive and respond to eedback on how its goods or services are provided to people with disabilities, including actions hat your organization will take when a complaint is received? [s. 7(1), (3) & (4)]	Yes
9. Does your organization make information about its feedback process readily available to the bublic, including how feedback may be provided (e.g. in person, by telephone, in writing, by email, on diskette or otherwise)? [s. 7(1) & (2)]	Yes
 10. Does your organization ensure that the following people receive training about providing your goods or services to people with disabilities: every person who deals with the public or other third parties on behalf of your organization, and every person who participates in developing your organization's policies, practices and procedures on providing goods or services? [s. 6(1)] 	Yes
11. Does this training include your organization's current policies, practices and procedures required under the Customer Service Standard and all the topics listed in section 6(2) of the standard? [s. 6(2) & (4)]	Yes
12. Does your organization have a written training policy that includes a summary of the contents of the training (per question 11 above) and details of when the training is to be provided, and does your organization keep records of the dates that training was provided and how many people were rained? [s. 6(5) & (6)]	Yes
13. Does your organization post a notice at a conspicuous place on your premises, on your website, or by another reasonable method, that the documents required by the Customer Service Standard are available upon request, and do you provide those documents in a format that takes a person's disability into account? [s. 8(1) & (2) & 9(1)]	Yes

OTHER LONDON TRANSIT ACCESSIBILITY POLICIES

Commission and Administrative Customer Service Policies

Stop Announcements – General

The Commission employs Smart Bus Technology on-board its accessible conventional fleet of buses which provides for the automatic announcement and display of next stop information on board all buses. A rigorous preventative maintenance program is in place supporting the effective operation of the system. Notwithstanding the program, there is a risk that the system may malfunction, with such malfunction applying to a specific bus and/or system wide. In such situations, every effort is made to mitigate the duration of any downtime associated with the malfunction.

The Administrative Policy relating to the calling of stops, in the event the automatic stop announcement feature is not functioning, is as follows:

In the event that the automatic stop announcement system fails to operate, the Operator will manually call out stops at the request of a passenger.

If the malfunction is system-wide, Dispatch will periodically announce through the radio system that the stop announcements feature is not functioning and that Operators will call out a specific stop at the request of the passenger.

If the stop announcement feature is malfunctioning on a specific bus, Operators are to contact Dispatch and arrange for the bus to be changed-off. While the bus is in service awaiting a new bus, Operators will notify passengers through the on-board radio that the system is not functioning and stops will be called upon request.

Stop Announcement – Route on Detour

Bus routes are subject to detour routing from time to time. The detour may be planned (e.g. relating to scheduled major road/sewer construction) or may be as a result of an unscheduled event such as water main break. Detours may require the establishment of temporary stops (replacing regular stops). The temporary stops are not identified as part of the route, noting next stop announcements require an accurate 'geo-code' of stops as well as a matching trip pattern within the system database. As detours can occur in any part of the City for varying durations, the ability to geo-code and create matching trip patterns would be extremely difficult to respond to, implement and maintain.

The Administrative Policy relating to the calling of stops, when a route is on detour, is as follows:

During periods when a route is on detour, the stop locations in the detour area will be identified and called by the Operator at the request of a passenger.

Service Disruptions – Detours

Consistent with the Commission's Customer Service Policy, a supporting Administrative Policy respecting the communication of detours has been established, which is as follows:

If detours are known within a sufficient notice period, in addition to placing notices on affected bus stops, public communication of the detour will be provided via the Commission's website, through public service announcements and posted on-board the bus. Information will also be available by phone from Customer Service staff.

For detours with little advance warning, notices are placed on affected stops and the website is updated as soon as possible. If the detour is of sufficient duration, the detour information will be provided via the Commission's website, through public service announcements and posted on-board the bus. Information will also be available by phone from Customer Service staff.

Postings on the Commission website are to include a warning that the information is accurate at time of posting and is subject to change without notice.

Transportation of Segways

A Segway is a battery operated two-wheeled electronic personal transportation device. At the Commission meeting on October 25, 2006, the Commission approved the prohibition of Segways on Conventional and Specialized Transit services. The prohibition related to the issue of safety both in terms of transporting a passenger while on the device and securement of the device once the passenger has transferred to a seat.

At the Commission meeting on January 27, 2010, the Commission heard a delegation requesting a reconsideration of the prohibition of Segways. The Commission concluded that there is no safe way to secure the device on-board transit vehicles (i.e. the design of the Segway is such that it was not intended to function as a transportable mobility aid).

In respect of the request and presentation, the Commission approved maintaining the existing policy prohibiting the conveyance of Segways on London's conventional and specialized transit services and directed the Administration take no further action in respect of the request.

Excerpt from Privacy Policy

Recognizing its responsibility under various Federal and Provincial legislation, and London Transit Commission's intent to fulfill its mandate in an open and accessible manner, the Commission supports the principles with respect to freedom of access to information and protection of personal information, as defined in the National Standard of Canada Model Code for the Protection of Personal Information (Can/CSA 830-96). The principles cover the areas of:

- Accountability
- Identifying purposes of collection
- Obtaining consent
- Limiting collection to the purposes required
- Limiting use, disclosure and retention of personal information to that reasonably related to the stated purpose of collection
- Accuracy in collecting and maintaining records
- Safeguarding the information collected
- Being open
- Providing individual access in formats which meet the requestor's accessibility needs
- Addressing challenges regarding compliance.

Further, the Commission designates the General Manager as being accountable on behalf of the Commission for the implementation of these principles in all aspects of the Commission's functions.

Excerpt from Purchasing Policy

All individuals, organizations and/or businesses acting on behalf of the London Transit Commission carrying on the business with London Transit customers shall be responsible for complying with the requirements of the Accessibility for Ontarians with Disability Act, including the related standards. Compliance will be at the individual's, organization's and/or business's expense. Failure to comply with the requirements may result in the termination of the applicable agency agreement. The individual, organization and/or business shall provide evidence of compliance from time to time as may be reasonably requested by London Transit

The above provision will be included in all "Request for Proposals" and agency contracts.