Submitted Monday September 22, 2025

I am making this submission to inform LTC Commission about two major issues pertaining to LTC Specialized Transit. The first being reported issues and the second is how LTC Staff has not addressed and resolved these issues since first documented to LTC in May 2025. My goal is to make LTC Specialized Transit better for all Riders and stakeholders. I would rather have LTC spend resources on addressing these, and other similar issues up front as opposed to LTC wasting significantly more resources after the fact to resolve them.

Liabilities To Report On

- LTC Specialized Transit web portal login system does not have modern security features for public facing
 web services, such as no multi factor authentication and no Pass Key functionality, thereby putting Riders'
 personal information at higher risk of getting stolen by malicious attackers exposing Riders' names, phone
 numbers, home addresses, health conditions and mobility aides used, and past and current trip times and
 addresses.
- 2. LTC Specialized Transit web portal has many Accessibility infractions for Riders using screen readers such as unlabelled buttons and links, double speak outs, misleading instructions, and embedded maps which restrict Riders who use screen readers from using the web portal.

How LTC Staff has not addressed these liabilities

- 1. Since it was documented in May, LTC Staff has claimed that the login system is sufficient for the service however without MFA and/or Pass Key functionality it exposes Riders' personal information at high risk.
- 2. LTC Staff has said that they checked for screen reader use before launching and claim that there are no issues and have dismissed evidence showing Accessibility issues that were documented in May and are still present.
- 3. LTC Staff has indicated Riders did not book a ride early enough in the day when the website logs would show that there were logins within a few minutes of the booking window opening for the day and it turned out it was another Accessibility issue that was being denied.

Requested Actions

- 1. Address and resolve the LTC Specialized transit login system to include multifactor authentication by text and authenticator app, and implement Pass Key functionality to be using current public facing security methods.
- 2. Address and resolve Accessibility issues as they pertain to screen reader use
- 3. Develop and implement procedures to address Accessibility requirements before changes are made as opposed to trying to fix them afterwards
- 4. Develop and implement procedures to address Rider's issues in a professional and timely manner
- 5. Provide an organizational chart for the management and operations of the Specialized Transit division