



***Accessibility Plan –2009 Update  
Appendix E***

***April 2010***

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## SECTION I - EXECUTIVE SUMMARY

This report serves as the sixth annual update to the London Transit Commission's Accessibility Plan, first adopted in 2003. The updating of the Plan is in conformance with the requirements of the Ontarians with Disabilities Act ("ODA"). The update serves as an annual report on the progress made to date with respect to the Plan direction. The plan was amended in 2007 to cover the period of 2007 – 2010 inclusive. The amendment included commentary with respect to compliance with standards developed under the Accessibility for Ontarians with Disabilities Act (AODA).

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 both in 2009 as well as 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 an update on 2009 activity, the following report includes summary discussion respecting 2010 accessibility work plan initiatives that form part of London Transit's business planning process, related 2010 annual work program and operating and capital budgets. 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.



David Waininger  
Chair, London Transit Commission  
April 2010

## 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 – 2009 Service Profile***

Type of service	Fixed route - modified radial service										
Service Area	Primarily within old City of London boundaries limited service extends into new City boundaries										
Hours of service	<table border="0"> <thead> <tr> <th><u>Day</u></th> <th><u>Times</u></th> </tr> </thead> <tbody> <tr> <td>Monday to Friday</td> <td>6:00 a.m. to 12:00 p.m.</td> </tr> <tr> <td>Saturday</td> <td>6:00 a.m. to 12:00 p.m.</td> </tr> <tr> <td>Sunday</td> <td>8:30 a.m. to 11:00 p.m.</td> </tr> <tr> <td>Statutory Holiday</td> <td>8:30 a.m. to 11:00 p.m.</td> </tr> </tbody> </table>	<u>Day</u>	<u>Times</u>	Monday to Friday	6:00 a.m. to 12:00 p.m.	Saturday	6:00 a.m. to 12:00 p.m.	Sunday	8:30 a.m. to 11:00 p.m.	Statutory Holiday	8:30 a.m. to 11:00 p.m.
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Sunday	8:30 a.m. to 11:00 p.m.										
Statutory Holiday	8:30 a.m. to 11:00 p.m.										
Annual passenger trips <sup>1</sup>	19.160 million										
Annual revenue service hours <sup>1</sup>	476,000 hours										
Annual kilometers <sup>1</sup>	10.186 million										
Number of routes	35 routes, plus 3 community bus operations 23 routes identified as accessible (i.e. utilizing low floor buses) 4 routes identified has having bike racks on all buses on route										
Types of services	<p>Mainline Downtown – 10 routes – 6 of which are designated to operate with low floor accessible buses</p> <p>Mainline Cross-town – 4 routes, 1 of which is designated to operated with low floor accessible buses</p> <p>Downtown/Suburban – 10 routes, 10 of which are designated to operate with low floor accessible buses</p> <p>Feeder/local – 9 routes, 2 of which are designated to operate with low floor accessible buses</p> <p>Community Bus – 3 routes, all of which are designated to operate with low floor accessible buses</p>										
Fleet makeup	Approved fleet size of 192 buses of which 141 were low floor accessible by December 31, 2009										

Note:

<sup>1</sup> 2009 operating performance impacted by the 29-day transit strike resulting in 33 days without conventional transit services.

## **Specialized Transit Services – 2009 Service Profile**

Type of Service	Shared Ride – Door to Door – Pre Booked Service										
	Registrants are able to book trips 3 days in advance. Trips, with the exception of subscription trips, are awarded on a first come first serve basis. There is not a guarantee of trip availability.										
Service Area	Within new City of London boundaries (i.e. includes the annexed areas)										
Hours of Service	<table border="0"> <thead> <tr> <th><u>Day</u></th> <th><u>Times</u></th> </tr> </thead> <tbody> <tr> <td>Monday to Friday</td> <td>6:00 a.m. to 12:00 p.m.</td> </tr> <tr> <td>Saturday</td> <td>6:00 a.m. to 12:00 p.m.</td> </tr> <tr> <td>Sunday</td> <td>8:30 a.m. to 11:00 p.m.</td> </tr> <tr> <td>Statutory Holiday</td> <td>8:30 a.m. to 11:00 p.m.</td> </tr> </tbody> </table>	<u>Day</u>	<u>Times</u>	Monday to Friday	6:00 a.m. to 12:00 p.m.	Saturday	6:00 a.m. to 12:00 p.m.	Sunday	8:30 a.m. to 11:00 p.m.	Statutory Holiday	8:30 a.m. to 11:00 p.m.
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Sunday	8:30 a.m. to 11:00 p.m.										
Statutory Holiday	8:30 a.m. to 11:00 p.m.										
Registrants	3,788										
Annual eligible passenger trips	196,300										
Attendant/companion trips	23,200										
Annual service hours	89,400 - includes both primary and secondary service providers										
Fleet requirements	Fleet requirements are provided by primary and secondary service providers. The primary service provider operates 23 vehicles, while the number of vehicles provided by the secondary service provider corresponds directly to demand and budget.										
Service Administration	<p>Service booking - handling in excess of 200,000 calls annually for trip booking, cancellations, etc.</p> <p>Service scheduling - providing daily schedules for primary and secondary service providers consisting of between 20 and 25 vehicles per day during peak periods and providing 196,000 plus trips on an annual basis.</p> <p>Dispatching service – deals with “real-time” monitoring of service.</p>										

## **Fares**

The following base fare program applies equally to each of the respective services:

### Cash

Adult	\$2.75
Child	\$2.35

### Ticket

Adult	\$1.90 – 5 tickets for \$9.50
Student (Grade 7 to 12)	\$1.54 – 5 tickets for \$7.70
Seniors (65 yrs and older)	\$1.43 – 5 tickets for \$7.15 (*)
Child (5 yrs to Grade 6)	\$1.10 – 5 tickets for \$5.50

(\*) London Transit receives an equalization grant from the City of London of approximately \$0.47 per ticket making the senior ticket fare equivalent to the adult ticket fare.

### Passes

Citipass (monthly)	\$81.00
Weekday (monthly)	\$69.00
Seniors (monthly)	\$57.50 (*)
Post-Secondary (monthly)	\$70.00
Student Summer Pass	\$81.00 (unlimited ridership, grade 7 to 12 only – for July & August)

(\*) London Transit receives an equalization grant from the City of London of \$23.50 per pass making the senior pass price equivalent to the monthly Citipass.

### Tuition Pass Program

Full-time students of Fanshawe College and UWO are assessed a fee in their tuition which permits them to access London transit services for either eight or twelve months.

Fanshawe College	12 months
UWO Undergraduate	8 months and 12 months
UWO Graduate (*)	12 months

(\*) Society of Graduate Students Program

### Other

CNIB pass holders, upon payment of a \$10.00 annual registration fee, are eligible for full conventional and specialized transit services. The City of London provides an equalization grant of \$29.70 per month per CNIB pass holder.

## **SECTION III - 2009 WORK PLAN INITIATIVES**

### ***Conventional Transit Service Plan – Accessibility Initiatives***

#### *Accessible Bus Stops and Shelters*

London Transit currently has approximately 2,200 bus stop locations throughout the service area. Since 1992, London Transit has been upgrading stops and passenger shelters with the objective of having all stop locations (where possible) being considered accessible.

A more aggressive stop upgrade program was implemented in 2009 as part of the Federal/Provincial Economic Stimulus Program, making it possible by the end of 2010 to have all stops adjacent to the City's sidewalk system having connecting concrete pads accessible. With the completion of the 2010 upgrade program, 93% of all stops will be considered accessible, noting the balance of the stops do not have connecting sidewalks.

A stop with a concrete pad that does not connect to the City sidewalk network is not considered accessible. The provision of a connector pad prior to a sidewalk being constructed is not feasible as the exact location or elevation of the sidewalk is not known. Post 2010, bus stops will be upgraded to accessible standards as the City 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 service passengers (e.g. driveways) requiring an accessible stop.

Given the City of London is responsible for construction of sidewalks, LTC Administration will, in 2010, confirm 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.

In terms of passenger shelters, 383 shelters are considered accessible in terms of design (current standard) and have concrete pads and/or a connecting pad from the stop area to a City sidewalk.

#### *Accessible Routes*

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 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, 23 are designated accessible noting Route #13 was scheduled to be designated accessible with the delivery of the 2009 replacement and expansion bus orders. The 23 routes represent 66% of the fixed route services. The 3 community bus services are designated accessible services. As part of the 2010 conventional transit service plan and subject to the delivery and placing in service of both the 2009 and 2010 new bus orders the #13 Wellington will be confirmed as an accessible route, with a further 7 routes being considered for designation as accessible routes. The 7 routes include the #10 Wonderland, #14 Highbury, #4 Oxford East, #25 Kilally, #27 Fanshawe College, #34 Medway and #38 Stoney Creek.

Should all 7 routes be designated, 31 of the current 35 routes will have been designated as accessible or 89% of the routes.

### Smart Bus Technology Implementation

Over the past 3 years, LTC has been engaged in a process that will 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 projected capital investment in the Smart Bus Technology initiative is \$6.5 million.

The features of the system and the respective phasing supporting improved customer service and accessibility are set out below.

#### *Phase I – completed late fall 2009*

- 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

#### *Phase II – spring 2010*

- implementation of an Interactive Voice Response system providing real-time service information by route and stop location
- accessing real-time schedule information via ‘WebWatch’ through LTC website
- traffic (transit) signal priority – interfacing of bus fleet (service) with City of London’s traffic light system

### Customer Service/Sensitivity and Awareness Training

In addition to the introduction of the revamped new Operator training program, ongoing refresher training continued throughout 2009. An aspect of the training deals specifically with sensitivity and awareness training as well as training regarding the Accessibility for Ontarians with Disabilities Act (AODA). By the end of 2009, all employees had received the revamped training program consistent with requirements in regulation 429-07 (Customer Service Standard).

### Accessible Conventional Transit Buses

By December 31, 2009, the fleet plan called for 80% of all buses to be accessible (i.e. low floor) with the entire fleet being fully accessible by December 2013. At December 31, 2009, the actual fleet totaled 192 buses with 151 or 78% being accessible. The delay in reaching the 80% target directly related to the timing of receipt of the 2009 new replacement buses (i.e. actual

delivery completed by March 2010). By December 31, 2010 target 86% of the fleet is scheduled to be low floor accessible (164 of 191 buses).

The 2013 target of having a 100% accessible fleet may be compromised given the elimination by the Province of Ontario's Bus Replacement Program (OBRP) effective 2011. The OBRP program provided one third funding of the cost of a new replacement bus. The impact of the elimination of the OBRP will be assessed as part of the development of the 2011 capital budget program.

### Commission and Administrative Customer Service Policy Development

Set out below is discussion on a number of customer service related Commission and Administrative policies adopted and/or clarified in 2009.

#### *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.*

#### *Courtesy Seating, Wheelchair Locations and Strollers*

Conventional transit service buses are equipped with two locations for mobility aids (e.g. wheelchair/scooter securement positions). The securement positions also double as courtesy seating areas. The securement of wheelchairs and scooters is created by flipping up the courtesy seats to provide access to the tie-down restraints.

This space is also often used by passengers with grocery buggies or child strollers. Courtesy seats are identified with a sticker as are the wheelchair/scooter securement positions. The multi function of the courtesy seating area and wheelchair/scooter securement positions can create competing demands for the limited space.

In terms of establishing a priority use for the identified locations, the Commission does not prioritize customer needs, in much the same manner and for the same reason as trips are not prioritized on specialized transit services. The respective customers may be subject to the same protection from discrimination under the Ontario Human Rights Code, which also does not assign priority for specific groups. In addition, not all disabilities are readily identifiable, which can lead to increased passenger/operator confrontation and potential conflict with Bill 168 pertaining to Violence in the Work Place incidents.

Accordingly, the following Administrative Policy has been adopted:

*Operators will request a passenger(s) to move from the courtesy seats in order to board and secure a wheelchair or scooter, noting the final decision to vacate the seat rests with the passenger(s).*

*Operators are not required to request a passenger(s) to move from the courtesy seats to accommodate another passenger(s) (other than for securement of a wheelchair or scooter) wishing to use the courtesy seat or the courtesy seat area.*

Based upon the policy, the following direction is provided to Operators via London Transit's Standard Operating Procedures:

*Courtesy seats are intended for those with mobility difficulties or elderly, however, the seats are not required to be vacated if the customer occupying the seat does not wish to move. Operators are not obligated to ask passengers to vacate the seat if someone else wishes to use the seat.*

*When a passenger in a wheelchair/scooter wishes to board the bus and the courtesy seats are occupied, the Operator will request the occupying passenger(s) to give up the seat so that the passenger in the wheelchair/scooter can board. If the occupying passenger(s) refuses to move, the Operator will advise the passenger in the wheelchair/scooter that there is no space available, advise same the time of the next bus and then contact Dispatch to advise the driver of the next bus of the passenger waiting to board.*

#### *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 directs 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.

**Specialized Transit Service Plan**

The approved 2009 operating budget for specialized services provided for an additional 10,000 annual eligible passenger trips (7,500 for 2009 noting April 1<sup>st</sup> effective date), bringing the budgeted eligible passenger ridership for 2009 to 194,000. The budgeted increase was intended to address the high non-accommodated trip rates being experienced; recognizing that certain of the additional trips would be taken up by the continued growth in registrants for the service resulting in increased demand for trips. The additional trips were targeted to reduce the current rate of non-accommodated trips from approximately 4.5% to the 2.5% level.

The table below sets out the actual ridership and performance measures for the specialized service for 2009.

**2009 Actual to Budget Performance**

Measure	Actual	Budget	Variance	Achieved Target
Eligible Passenger Trips	196,348	194,000	1.2 %	✓
Attendant/Companion Trips	23,226	22,100	5.1 %	✓
Total Ridership	219,574	216,000	1.6 %	✓
Rides over 1 Hour	2.0%	2.5%	(22.0)%	✓
Pickups over 30 Minutes	0.4%	0.6%	(30.6)%	✓
Cancellations	15.0%	12.0%	22.8 %	✗
No-Shows	1.5%	1.0%	49.6 %	✗
Non-Accommodated Trips	3.4%	2.3%	46.6 %	✗

Other Policy/Program Changes

*One Day Booking Window*

The move to a one-day booking window for the specialized service has been deferred in each of the past 2 budget years. Given the issue of growing demand for the service, uncertainty over

funding sources, and the uncertainty around pending, mandatory and competing service requirements under the AODA, the actual implementation of a shortened booking window was again deferred in 2009, and in all likelihood, will be deferred until such time as AODA standard requirements are known, including the respective compliance dates.

*Transportation of Children and Infants – Specialized Transit*

At the March 25, 2009 meeting, the Commission approved a Specialized Service policy change which provides for the transport of children and infants on the specialized service, effective September 1, 2009. The new policy is set out in Enclosure I.

The policy which took effect September 2009 and related implementation program provided for the retrofitting of two specialized transit service vehicles (primary carrier fleet only), training of specialized service drivers on securement protocol, public communication strategy and policy assessment. The target date was met and the policy assessment is scheduled for April 2010.

Specialized Transit Service – 2009 Performance and 2010 Targets

In response to the increased demand for trips, service levels were increased in 2009. In total, the 2009 budget provided for the provision of approximately 7,500 additional eligible passenger trips over that provided in 2008.

While the 2009 service levels were enhanced significantly, the impact on addressing the demand for service did not meet expectations. The following table provides a summary comparison of key service characteristics 2008 versus 2009.

**Service Changes – 2008 versus 2009**

	<b>2008</b>	<b>2009</b>	<b>Variance</b>	<b>% Variance</b>
Total Registrants	3,498	3,788	290	8 %
Eligible Passenger Trips (EPT)	187,465	196,348	8,883	5 %
Attendant/Companion Trips	22,842	23,226	384	2 %
<b>EPT's per Registrant</b>	<b>53.6</b>	<b>51.8</b>	<b>(1.8)</b>	<b>(3)%</b>
Companion Trips per Registrant	6.5	6.1	(0.4)	(6)%
<b>Non Accommodated</b>	<b>15,324</b>	<b>13,671</b>	<b>(1,653)</b>	<b>(11)%</b>
Total Service Hours	82,499	89,445	6,946	8 %
<b>Service Hours per Registrant</b>	<b>23.6</b>	<b>23.6</b>	<b>--</b>	<b>-- %</b>

As indicated, while there was an 8% increase in the number of service hours, there was no change in the total service hours per registrant which is directly attributable to the 9% increase in the number of registrants. This combination of measures indicates that the additional service in 2009 kept pace with the growth in registrants, but did little to address existing demand.

While it is understood that there will always be a need for various forms of specialized services to accommodate the transportation requirements of persons with disabilities, and as such, investment in the program will continue to be enhanced, in order to effectively manage the growth pressures while ensuring a reasonable quality of service, it will be critical to continue to develop and promote the use of accessible conventional transit services. Options to be considered include:

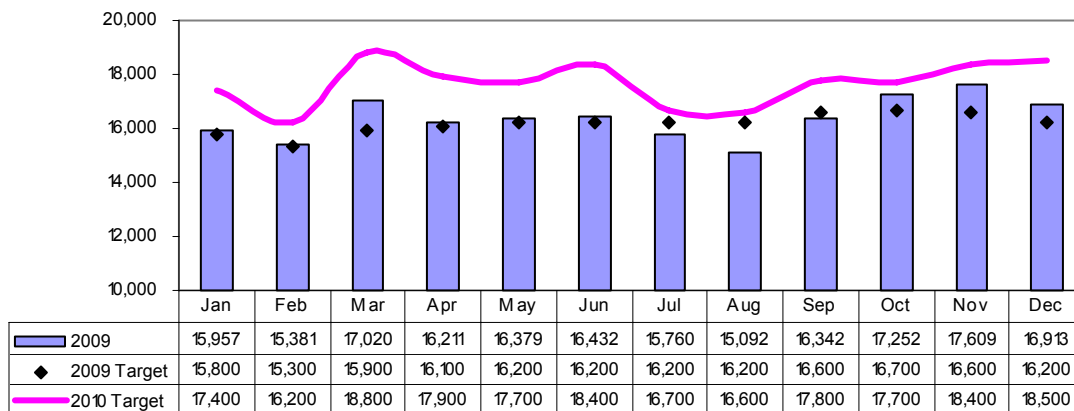
- providing a specialized trip from the customer's door to the nearest terminal location, and having the customer transfer to an accessible bus to complete their trip
- promoting the use of accessible conventional services through additional Get on Board information sessions
- encouraging specialized customers to try accessible conventional services by providing them with the route and schedule information of an accessible bus that could provide them with a trip that is considered non-accommodated on the specialized service

These items will be considered as part of the respective 2010 service plans for conventional and specialized service. Consideration will also be linked to the pending AODA transportation standard.

Eligible Passenger Trips

Eligible passenger trips are defined as the total number of trips provided to registrants of the specialized services, over a given time period. The target for 2009 was 194,000 or 3.4% more than in 2008. This measure is directly impacted by budget, as the amount of available funding dictates the level of service which can be provided in a given year. As the graph illustrates, eligible passenger trips for 2009 exceeded the target by approximately 2,300 trips.

**Eligible Passenger Trips**



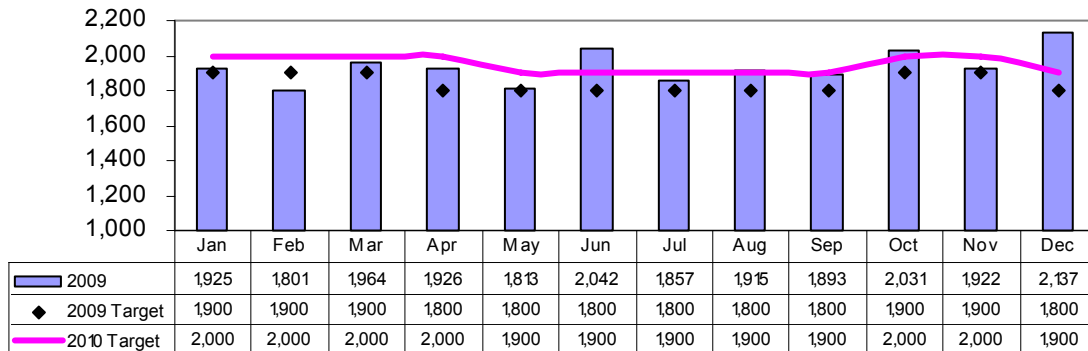
The target established for 2010, as illustrated in the graph, represents a growth in eligible passenger trips of approximately 15,700 (8%) over those provided in 2009. Consistent with the approach taken in 2009, all growth funding in the 2010 Specialized Transit service budget have been allocated to the provision of additional service based on the rationale that the existing customer base will be best served by additional service levels until such time as the AODA Transportation Standards are finalized. Given the nature of some the requirements being considered for the Transportation Standard, it is anticipated that future budget growth dollars will be allocated in full to achieve compliance with same.

Attendant/Companion Trips

Attendant/Companion trips are defined as the total number of trips provided to those providing attendant care to or companions of registrants of the specialized services. The trips provided in this category are subject to fluctuation due to a number of factors including the eligible passenger trips being provided (i.e. registrants that require an attendant), and the capacity of the vehicles during trip time (i.e. companion travel is subject to capacity). The target for 2009

was 22,100 trips. As the graph illustrates, attendant/companion trips for 2009 exceeded the target by approximately 1,100 trips.

### Attendant/Companion Trips



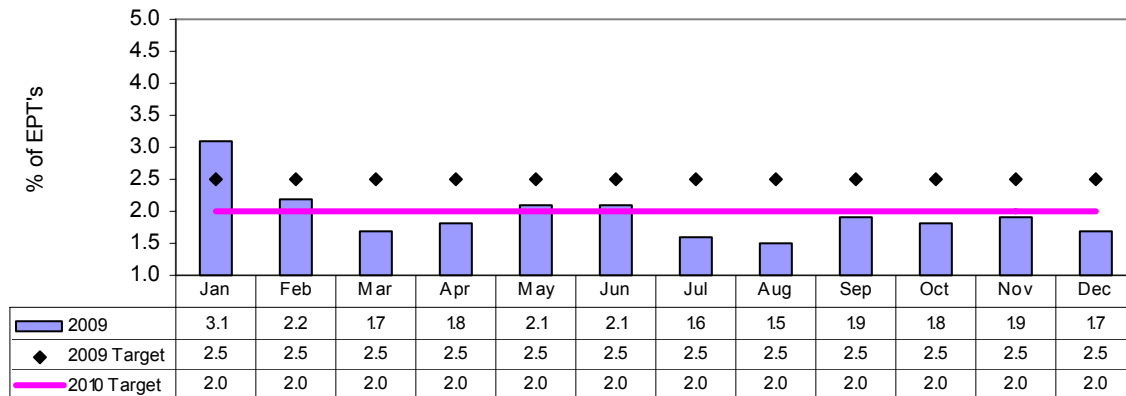
The target established for 2010 of 23,400 attendant/companion trips, as illustrated in the graph, represents the growth in eligible passenger trips and the association of attendant/companion trips.

### Rides Over 1 Hour

This measure provides an indication of the percentage of eligible passenger rides, in a given period, on the specialized service which were over 1 hour in duration (from time of boarding to time of deboarding). The measure can be subject to fluctuation due to a number of factors, including trip origin/destination by registrant, weather, time of day, and traffic conditions.

Over the past several years, the measure has been directly impacted by the location of key origin and destination points in the City, resulting in longer ride times, which in some cases, cannot be completed in under 60 minutes. Improving the trips over 1 hour that are directly influenced by the origin/destination or time of day would require them to be scheduled as direct trips (i.e. only passenger on board vehicle with no stops between origin and destination) versus a shared ride. While keeping the target low may be desirable from a customer point of view, it has to be balanced with the resulting decrease in terms of effective use of resources supporting the maximum of amount of trips to be provided. For 2009, the target for Rides over 1 Hour was 2.5% of eligible passenger trips (4,850 trips). The actual number of rides over 1 hour provided in 2009 was 3,380 (1.9%), which is approximately 1,470 trips or 30% better than target.

### Rides over 1 Hour

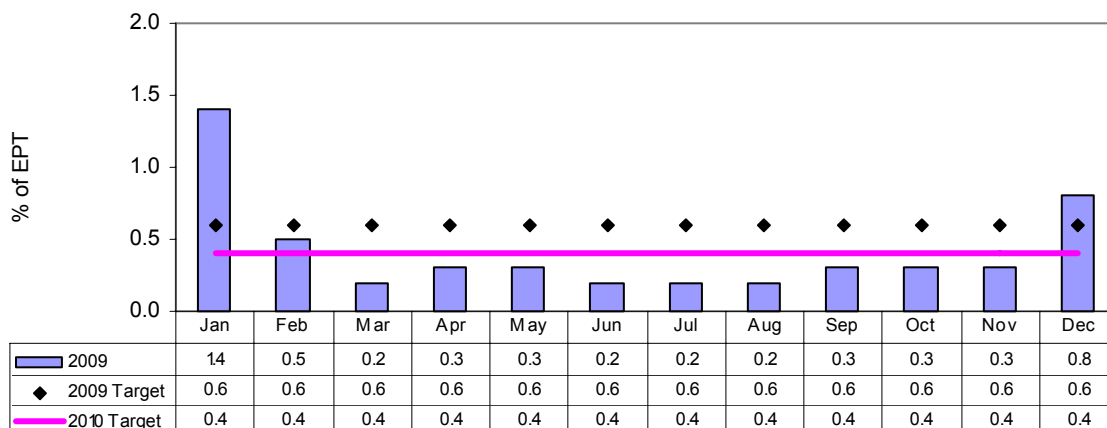


The target established for 2010 of 2.0% for rides over 1 hour, represents approximately 4,240 trips, a decline of 12.5% over 2009 targets.

### Pick-ups Over 30 Minutes

This measure provides an indication of the percentage of eligible passenger riders who were not picked up within 30 minutes of their scheduled pick-up time. This measure can be subject to fluctuation due to a number of factors including weather, time of day, traffic conditions and efficiency of the driver's schedule. Trips are assigned to vehicles in a manner which balances efficiency and effectiveness (i.e. shared ride with reasonable routing for all passengers), however, as changes occur throughout the day, trips may need to be assigned to a vehicle that impact that efficiency in a negative manner. For 2009 the target for Pick-ups over 30 Minutes was 0.6% of eligible passenger trips, or approximately 1,160 trips. The actual number of trips with pickup times greater than 30 minutes beyond the scheduled time was 721 or 0.4%.

### Pick-ups Over 30 Minutes



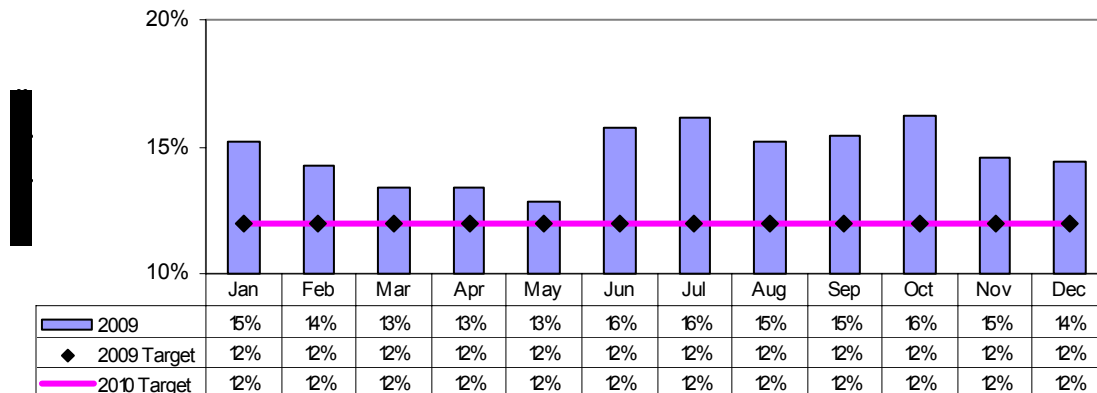
The target established for 2010 of 0.4% for pickups over 30 minutes, represents approximately 850 trips, a decline of 26.7% over 2009 targets.

### Cancellations

This measure provides an indication of the percentage of total bookings that were cancelled prior to 3 hours before the scheduled pick-up time. This measure can be subject to fluctuation,

primarily due to poor weather conditions. From a service efficiency perspective, it is best to keep this percentage as low as possible, however, from a customer perspective, the ability to cancel trips provides for much-needed flexibility. The current policies and procedures for the delivery of specialized services provide for the opportunity to follow-up with customers who have a high number of cancellations in a given month (i.e. higher than the monthly average). The underlying intent of this program is to inform customers of the negative impact cancellations have on the service, noting that trips cancelled at the last minute result in a lost trip opportunity for another registrant. For 2009, the target for Cancellations was 12% of total bookings. The actual number of cancelled trips in 2009 was approximately 34,600, or 15%.

### Total Cancellations

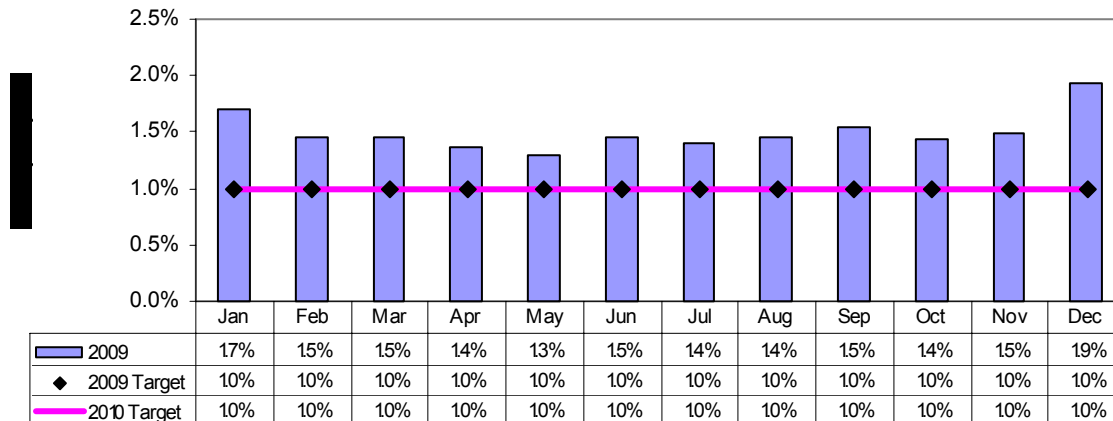


Given the significant variance between the targets established for 2009 and the actual rate of cancellations, coupled with the understanding of the negative impacts on service efficiency of a high cancellation rate, the target for 2010 will remain at 12%, noting the Accessible Public Transit Service Advisory Committee has recommended that administration focus on an awareness campaign in 2010, reminding customers of the negative impacts of cancellations and no-shows.

### No-Shows

This measure provides an indication of the percentage of total bookings where the registrant was not at the designated pick-up location at the scheduled pick-up time (i.e. within 5 minutes of scheduled time). No-shows cause the most significant negative impact on service efficiency. The current policies and procedures respecting no-shows provide the opportunity to follow-up with customers who have a high number of no-shows in a given month (i.e. higher than the monthly average). The underlying intent of the policies and procedures to inform customers of the negative impact no-shows have on the service, and to encourage customers to contact the brokerage in the event they are unable to make their trip. When the policies and programs were established it was recognized that the occurrence of a no-show may be outside the control of the customer. For 2009, the target for No Shows was 1% of total bookings. The actual number of trips that were no-showed in 2009 was approximately 3,500 or 1.5%.

### Total No-Shows

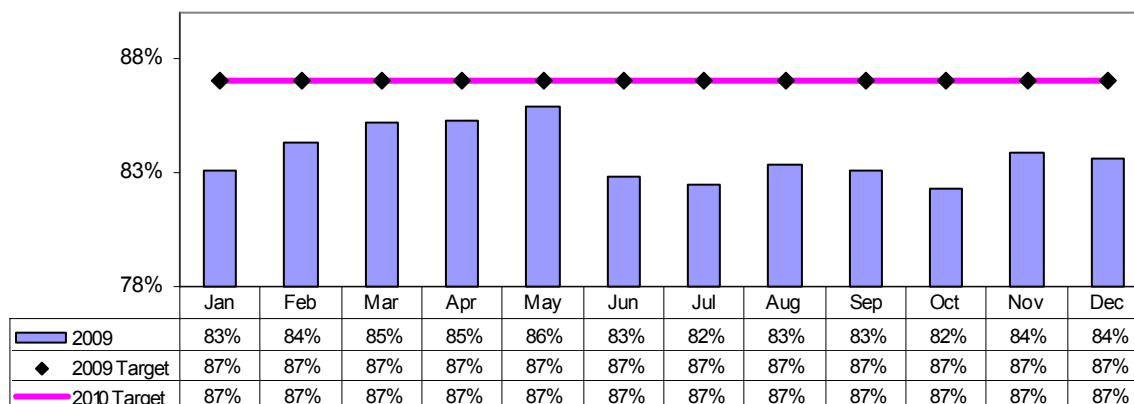


Given the variance between the targets established for 2009 and the actual rate of no shows, coupled with the understanding of the negative impacts a high rate of now shows has on the efficiency of the service, the target for 2010 will remain at 1%, noting the Accessible Public Transit Service Advisory Committee has recommended that administration focus on an awareness campaign in 2010, reminding customers of the negative impacts of cancellations and no-shows.

### Total Trips Completed (Booked versus Taken)

This measure provides an indication of the percentage of booked trips that were actually taken (i.e. booked trips less cancellations and no-shows) which provides a summary of the impact of cancellations and no shows on the service provided. As with the cancellation and no-show targets, from a service provider perspective the target should be high, indicating the fewest possible cancellations and no shows, however, it must be balanced with the need for flexibility on behalf of the customer. For 2009, the target for Trips Completed was 87% of total bookings. As illustrated in the graph, the actual trip completion rate for 2009 averaged 84%

### Total Trips Completed



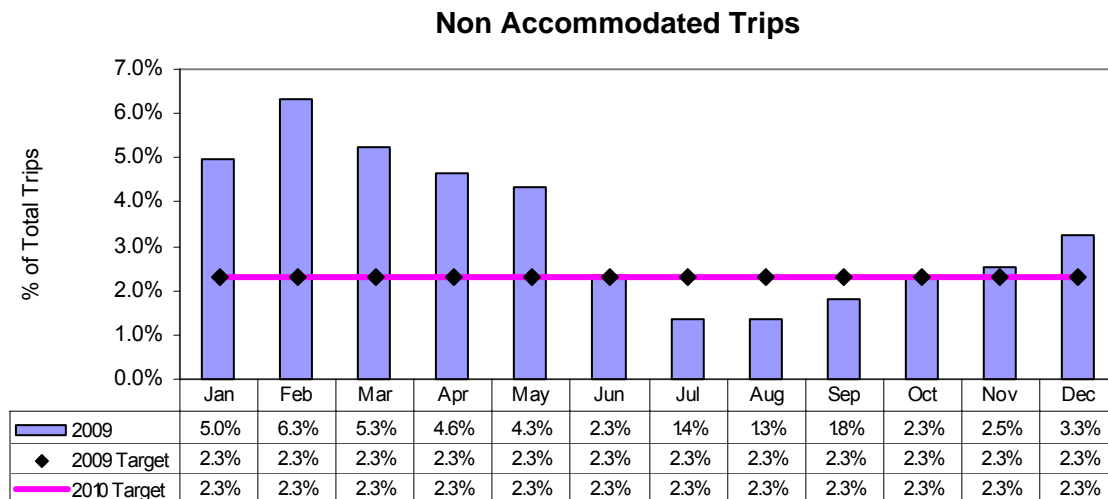
Given the variance between the targets established for 2009 and the actual trip completion rate, the target for 2010 will remain at 87%.

### Non Accommodated Trips

This measure provides an indication of the number of trip requests that were unable to be accommodated within one hour of the requested time. The measure can be impacted by a

number of factors including trip length, time of day, amount of service available, and number of registrants. The underlying goal of the specialized service is to provide the greatest number of trips as efficiently and effectively as possible, within established budgets. For the five year period, 2006 to 2010 inclusive, the annual operating budget increased by approximately 40% (8% per year). The increase is reflective of the investment to address growth in registrants as well as mitigate the level of non-accommodated trips. The growth is in addition to the expansion of accessible conventional services.

The growth in registrants is attributable to a number of factors including the expansion of eligibility criteria in 2002 and demographics. For 2010 the target for Non Accommodated Trips is 2.3% of total bookings.



### **Customer Feedback – Conventional and Specialized Transit Services**

In addition to the ongoing discussion via the Accessible Public Transit Service Advisory Committee, feedback from customers (good, bad or indifferent) serves as key inputs to London Transit’s approved service plan including those elements dealing specifically with accessibility. The following discussion serves to provide a summary of customer feedback received in 2009.

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.

### **Summary of Public Contacts - 2009**

Year	Specialized		Conventional		Total	
	Contacts	Per 10,000 Passengers	Contacts	Per 10,000 Passengers	Contacts	Per 10,000 Passengers
2009	80	4.1	3,385	1.7	3,465	1.8
2008	130	6.9	3,445	1.6	3,575	1.6
% change	↓ 38%	↓ 41%	↓ 2%	↓ 6%	↓ 3%	↑ 12.5%

### Conventional Transit Service Contacts

All contacts are processed with the respective departments taking appropriate follow-up action, which includes recording service and service related requests and, where appropriate, following-up with individual staff on both compliments and complaints.

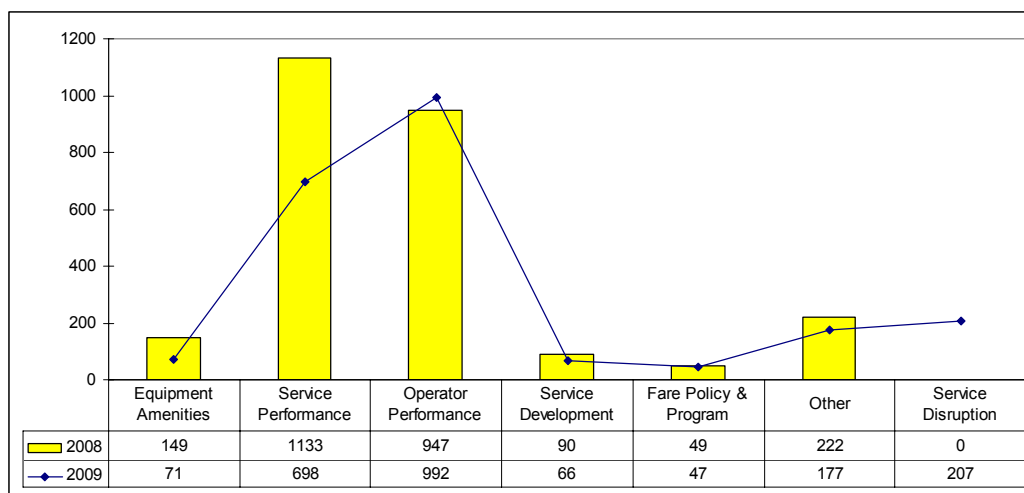
#### Summary of Conventional Transit Contacts - 2009

	Compliment	Request	Complaint	AVL	Total	% of Total
Equipment Amenities	5	93	71	74	243	7%
Service Performance	84	37	698	1	820	24%
Operator Performance	111	4	992	1	1,108	33%
Service Development	6	191	66	4	267	8%
Fare Policy	1	26	47	2	76	2%
Other	12	126	177	1	316	9%
Service Disruption	1	242	207	105	555	17%
<b>Total 2009</b>	<b>220</b>	<b>719</b>	<b>2,258</b>	<b>188</b>	<b>3,385</b>	<b>100%</b>
Percent make up	6%	21%	67%	6%	100%	
<b>Total 2008</b>	<b>209</b>	<b>601</b>	<b>2,590</b>	<b>45</b>	<b>3,445</b>	<b>100%</b>
Percent make up	6%	17%	75%	2%	100%	

The decrease in conventional transit contacts is largely attributed to conventional transit service not being provided between November 16 and December 18, 2009, noting partial service was restored effective December 19, 2009 with full scheduled service restored on December 23, 2009. There were 555 contacts pertaining to the labour disruption. The nature of contacts reflected the public's desire to end the labor dispute, comments regarding demands of ATU Local 741 and the continuous need for bus service.

The chart below provides a breakdown of the largest categories of complaints in 2009 with comparable information for the same time frame in 2008.

#### Breakdown of Complaints – 2009 versus 2008

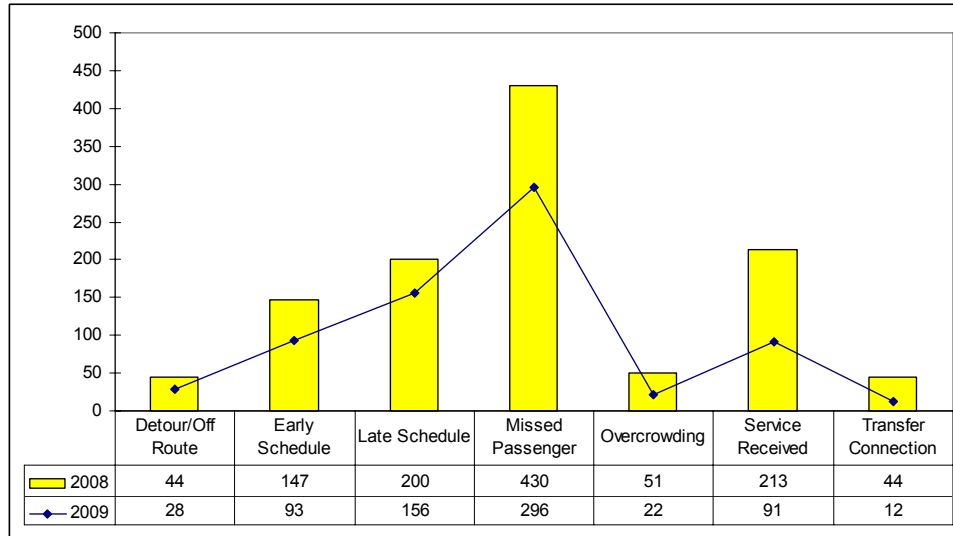


The labour dispute also resulted in a decrease of complaints by 13% compared to the same time frame in 2008 (2,258 vs. 2,590). There was a slight increase in the Operator Performance category of 44 or 4%. Complaints in the 'Other' category increased by 161 or 42% compared to

the same time in 2008. The higher number of complaints was largely influenced by the 2009 labour dispute and reflected the public's displeasure with the level of and/or lack of service.

The chart below sets out the breakdown of Service Performance complaints with comparable data for the same time frame in 2008.

**Breakdown of Service Performance Complaints - 2009**



Service Performance complaints declined by 435 or 38%. The labour dispute resulted in a decline of complaints in all categories particularly Missed Passenger and Service Received (134 or 31% and 122 or 57% respectively).

Specialized Transit Service Contacts

A total of 80 specialized transit contacts were received in 2009, compared to 130 contacts during the same timeframe in 2008.

The table below sets out the make up of the contacts, which were forwarded to the brokerage staff for appropriate follow-up with the customer and/or the respective service provider.

**Summary of Specialized Transit Contacts - 2009**

	Compliment	Request	Complaint	Total	% of Total
Customer Service	11	2	54	67	83%
Equipment/Amenities	1	1	3	5	6%
Fares	0	0	0	0	0%
Service Performance	0	0	9	9	11%
<b>Total 2009</b>	<b>12</b>	<b>3</b>	<b>66</b>	<b>81</b>	<b>100%</b>
Percent make up	15%	4%	81%	100%	
<b>Total 2008</b>	<b>9</b>	<b>10</b>	<b>111</b>	<b>130</b>	<b>100%</b>
Percent make up	7%	8%	85%	100%	

The lower number of contacts is reflective of an increase in almost 7,000 service hours provided on the specialized transit service, as compared to 2008.

## **Summary of 2009 AODA Specific Work Plan Initiatives**

### *Accessibility for Ontarians with Disabilities Act (AODA) – Standard Development*

Throughout 2006, 2007 and 2008 the transit industry at large has participated in the development of transportation specific standards under the requirements of The Accessibility for Ontarians with Disabilities Act (AODA). Representation on the Transportation Standards Development Committee (T-SDC) includes a member of London Transit Commission administration. London Transit administration also chaired and participated on the transit industry resource team, which was established to provide stakeholder input to the transit representatives on the T-SDC.

In the latter part of 2007, the Association of Municipalities in Ontario (AMO) established resource teams to support the AMO representatives on each of the Information and Communications, Employment and Built Environment standard development committees. A member of London Transit administration is the AMO representative on the Employment Standard Development Committee, and two other members of administration are chairing the Employment and the Information and Communication resource teams. Administration will also participate in the Built Environment resource team.

In all cases, regular updates are provided with respect to progress on the various standard development committees to both the Accessible Public Transit Service Advisory Committee as well as the London Transit Commission. Input provided by the London Transit Commission during the public review periods has taken into account feedback from the Accessible Public Transit Service Advisory Committee.

### *Customer Service Standards – Regulation 429-07 (CSS)*

On January 1, 2008, Regulation 429-07 (regulation relating to requirements of the Customer Service Standard) came into effect, setting in place the first set of standard requirements under the AODA. The timelines associated with the requirements, as provided by regulation, call for public sector organizations to be in full compliance by January 1, 2010. As such, a number of initiatives were added to the 2009 work plan in attempt to ensure compliance with the regulation by the specified date. The following provides a brief overview of the progress in 2009 with respect to compliance with the regulation.

### *Assessment of City of London Policy vs. LTC Policy*

The LTC Policy, as required under Regulation 429-07, was amended in 2009 to provide for consistency with the City of London Policy. The revised LTC Policy is set out in the first section of this plan. The amended policy, as approved by the Commission on July 30, 2009, was endorsed by the Accessible Public Transit Service Advisory Committee. A copy of the Policy is set out in Enclosure II.

### *Provision of Publications in Alternative Formats*

Preliminary work was completed on this initiative noting more detailed requirements relating to this provision are anticipated to be included in the Information & Communication Standard. The policy dealing with this item is set out in Section III of this plan.

### *Identification of any Signage, Layout or Equipment Issues*

A workgroup was established to conduct a facility audit to identify and make recommendations for any barriers relating to signage, layout or equipment issues. Given the significant renovations to the facility at the 450 Highbury Avenue location beginning in the late fall of 2009, modifications relating to counter heights, automatic door openers etc. have been included in this project. While not all areas of the facility were complete by the end of 2009, the project is scheduled to be completed by the fall of 2010, at which time all identified area will be addressed.

### *Training*

All remaining employees who had not received the AODA Customer Service Training in 2008 received it in 2009.

### *Training of Agents*

Responsibility for training of ticket agents was assessed as attaching to the individual agents versus LTC. The position recognizes ticket agents as “independent contractors”, noting the selling of fare media is not an integral or essential part of the contractors 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. This viewpoint was shared with the Minister of Community and Social Services through the Ontario Public Transit Association.

### *Addressing Location and Presentation of Information at Info Posts (located at bus stops)*

This item was reviewed in light of the requirements in the Customer Service Standard, and further work was deferred until such time as the Information & Communication Standard is completed, noting the expectation that more detailed requirements will be set out therein.

### *Assessing Process for Communicating Service Disruptions*

This process is detailed in the LTC policy set out in Section III of this plan.

### *Assessing Process for Communicating When Smart Bus Technology Fails*

This process is detailed in the LTC policy set out in Section III of this plan.

### *Filing of Compliance Report*

The public sector was required to be compliant with the Customer Service Standard (Regulation 429-07) January 1, 2010, and was required to file a compliance form on-line with the Ministry of Community and Social Services by March 31, 2010. Administration encountered an issue when filing the compliance report in that the London Transit Commission was not listed in the Ministry’s database as a separate entity from the City of London. The Ministry was provided documentation from the Commission’s legal counsel indicating the Commission’s authority to operate as a separate entity and updated their database accordingly. Subsequent to the database update, Administration completed the online compliance form, a copy of which, including the LTC responses, is set in Enclosure III.

### *Other AODA Standards*

As previously indicated, the London Transit Commission Administration continues to be actively involved in the development of the three remaining standards (i.e. Employment, Information & Communication and Built Environment) as well as the Transportation Sector Specific Standard.

A number of these standards are expected to become regulation in 2010. Many of the initiatives that have been undertaken in 2009 as well as those planned for 2010 and beyond are reflective, in part of certain anticipated AODA requirements, for example as previously discussed, the setting, in consultation with Accessible Public Transit Service Advisory Committee of key specialized transit service performance indicators.

Throughout 2010, London Transit Commission Administration will provide updates on the status of remaining AODA standards, including seeking input and direction from the Accessible Public Transit Service Advisory Committee and Commission respectively.

On a going forward basis, the requirements of the respective AODA Standard will be reflected in the four year Accessibility Plan which is subject to annual updates, including discussions on the progress that has been made in meeting the standard's requirements.

#### *2010 Work Plan*

The tables in Enclosure I consolidate the barriers identified through the Accessibility Plan development process. The identified barriers are grouped by six major categories, namely, services, transportation, employment, facility, information/communication and customer service

As indicated on the tables (Enclosure I), the business of addressing the barriers is continuous. Meeting the targeted timelines will be dependent upon the availability of both human and financial resources, recognizing both limitations of the resources and the competing (both internal and external) demands for the resources. The tables have been updated to reflect the status of each project scheduled for completion in 2009, as well as those planned for 2010. These tables will be updated each year and form part of the appendices for that year's annual update report. As previously noted, certain of the 2010 initiatives are discussed in greater detail in the earlier section of the report.

## SECTION IV - METHODOLOGY FOR ANNUAL UPDATE

### *Annual Plan Update*

The current Accessibility Plan covers a four year period, 2007–2010. The plan is updated on an annual basis, based on the previous year's performance and changing requirements. The following diagram depicts the process.

#### LTC Accessibility Plan Process



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

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

The LTC Accessibility Plan feeds directly in to the LTC overall Business Plan Process.

**TABLE I – SERVICE**

The initiatives set out in the following table were established prior to the standard development process current underway as part of the Accessibility for Ontarians with Disabilities Act. The initiatives in this table will be specifically impacted by the Transportation Standards, which are currently under development, and are anticipated to be completed sometime in 2008. There may also be implications for the initiatives below from the other AODA standards under development.

The identified initiatives and implementation timeframes may be subject to change in the future given their consistency with the final AODA standards and associated timelines adopted into regulation.

Issue	Service	Description	Action	Who	2007	2008	2009	2010
Bus Stops- Sidewalks	CT	Access to stop location- sidewalk design/curbs including identification of missing curbs	a) Compile a listing inventory of accessibility issues re sidewalk access given stop locations b) Prioritize improvements and establish program to implement	LTC City	b) Ongoing	b) Ongoing	b) Ongoing	X
Bus Stops- Stop design	CT	Design features of the stop itself create barriers	a) Update inventory of stop definitions b) Continue, in a prioritized manner, to implement approved bus stop standards and technical guidelines	LTC LTC	b) Ongoing	b) Ongoing	b) Ongoing	X
Bus Stops- shelters	CT	Design features such as striping, access to those on wheelchairs	a) Update inventory of shelter status b) Continue, in a prioritized manner, to implement bus stop standards and technical guidelines	LTC LTC	b) Ongoing	b) Ongoing	b) Ongoing	X
Bus Stops- distance to stops	CT	Mobility impaired may not be able to reach the stop	As part of the Annual Service review, continue to look at improvements which may include flex routes, increased number of stops, rerouting of service	LTC	X	X	X	X
Accessibility of Information at Info-posts	CT	Reg 429/07 audit identified an issue with the location of info posts (i.e. not accessible to those in mobility devices)	Investigate issue further, including consideration of all disabilities, and develop options to address same. Implement fix giving consideration to budget and operational issues (timing)	LTC		X	X	X
Bus Boarding/alighting	ST	Establishment of boarding/alighting area at new and existing facilities	Continue to provide input to site plan development process. Review customer contacts to identify higher need locations	LTC City	X	X	X	X

CT – Conventional Transit ST – Specialized Transit

**TABLE I – SERVICE (continued)**

<b>Issue</b>	<b>Service</b>	<b>Description</b>	<b>Action</b>	<b>Who</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>
Service Quantity-Accessible routes	CT	Majority of bus routes are not accessible	Continue to expand, in a prioritized manner, the number of accessible routes, based on low floor bus availability and stop upgrades.	LTC	2007 Review Complete	2008 Review Complete	2008 Review Complete	X
Service Quantity-level of services	ST	Number of non-accommodated trips	Continue to develop and implement the family of services consistent with resource availability and direction of LTC Business Plan. Priorities set in annual work plan	LTC	Ongoing	Ongoing	Ongoing	X
Service Quality	ST  CT/ST	a) 3 day advanced booking window b) late/no show policy c) baggage policy d) attendant policy (attendant fare) e) on-time performance f) length of time on vehicle for trips	Specialized service policies are subject to review and assessment utilizing a series of key performance measurements. Action to be taken to balance impact on quantity and quality of service with availability of resources	LTC	a) deferred  b) deferred c) deferred d) deferred  e) complete f) complete	a) deferred  b) deferred c) deferred d) deferred	a) deferred  b) deferred c) deferred d) deferred	X  X X X
Eligibility for Specialized	ST	Individuals with “temporary disabilities” not eligible for Specialized	Review expansion of current eligibility criteria to include temporary disability. The review will be linked to the pending AODA standards	LTC	Delayed	Delayed re: AODA	Delayed re: AODA	X
Service Integration	ST/CT	Currently no provision for transfer between services	Review various issues and impact, e.g. transfer connections/ service scheduling and develop implementation plan for consideration	LTC		Delayed	Delayed	X

CT – Conventional Transit    ST – Specialized Transit

**TABLE I – SERVICE (continued)**

<b>Issue</b>	<b>Service</b>	<b>Description</b>	<b>Action</b>	<b>Who</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>
System Navigation	CT	Ability of riders to identify stop locations, orient oneself in time and space	Expand trip planning/travel training programs. Assess issue re on board communication by operators re stop locations. Site specific identification	LTC/ Community Agencies	Program Ongoing	Ongoing – Smart Bus Features	Ongoing Smart Bus Features	X
Customer Service	CT/ST	a) Driver/ Operator Awareness b) Fleet reliability (i.e., Accessible buses not Available) c) Public timetables and Schedules	Continue both global and disability awareness training, including sensitivity to special needs Ongoing maintenance and fleet replacement program and working with suppliers to improve product quality Analyze and deliver alternatives for low vision riders	LTC	a) Ongoing b) Ongoing c) Ongoing	a) Ongoing b) Ongoing c) Ongoing	a) Ongoing b) Ongoing c) Ongoing	a) X b) X c) X
Behavioral Compatibility	CT/ST	Behavioural issues associated with certain disabilities impacting service operations	Public awareness and acceptance through communication. Continued development of attendant travel program and working with community supporting agencies	LTC/ Community Agencies	Ongoing	X		
Sensitivity and Awareness Training	CT/ST	Training for all service delivery representatives on sensitivity and awareness training	Continue to deliver, as scheduled, sensitivity and awareness training	LTC/ Service Providers	Ongoing	Ongoing	Ongoing	X

CT – Conventional Transit ST – Specialized Transit

**TABLE II – TRANSPORTATION**

<b>Potential Future AODA Requirements</b>								
<b>Issue</b>	<b>Service</b>	<b>Description</b>	<b>Action</b>	<b>Who</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>
Consistent hours of service for conventional and specialized services	CT/ST	Service hours for all public transit services must be consistent	Effective September 2008, service hours on the specialized services will be increased on weekdays and Saturdays and decreased on Sundays to make them consistent with the hours of service operated on conventional services in London.	LTC/ Service Providers		Complete		
Performance Measures for Specialized Services	CT/ST	Create performance measures for key service indicators in consultation with the Accessible Public Transit Service Advisory Committee.  Report on measures on a regular basis	Work in conjunctions with the Accessible Public Transit Service Advisory Committee to establish performance measures for key service indicators.  Track and report on performance against measures on a regular basis.	LTC		X Ongoing	X Ongoing	X X
Participate in creation of AODA Transportation Standard	CT/ST	Participate through membership on the standards development committee to provide stakeholder input to the standard development process	Administration will continue to participate through the AMO resource team to provide stakeholder input to the standard development process. Administration will also continue to keep the Accessible Public Transit Advisory Committee and London Transit Commission abreast of all developments and seek input where required.	LTC	Ongoing	Ongoing	Ongoing	X
Final AODA Transportation Standard	CT/ST	Review all requirements and timeframes associated with the final Transportation Standard	All requirements and associated implementation timeframes in the Transportation Standard will be reviewed and incorporated into future workplans and budgets (both operating and capital)	LTC		Ongoing	Ongoing	X

CT – Conventional Transit ST – Specialized Transit

**TABLE III – EMPLOYMENT**

The initiatives set out in the following table were established and completed prior to the standard development process current underway as part of the Accessibility for Ontarians with Disabilities Act. The initiatives in this table will be specifically impacted by the Employment Standards, which are currently under development, and are anticipated to be completed sometime in 2008. There may also be implications for the initiatives below from the other AODA standards under development.

<b>Issue</b>	<b>Service</b>	<b>Description</b>	<b>Action</b>	<b>Who</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>
Participate in creation of AODA Employment Standard	CT/ST	Participate through AMO resource team to provide stakeholder input to the standard development process	Administration will continue to participate through the AMO resource team to provide stakeholder input to the standard development process. Administration will also continue to keep the Accessible Public Transit Advisory Committee and London Transit Commission abreast of all developments and seek input where required.	LTC		Ongoing	Ongoing	X
Final AODA Employment Standard	CT/ST	Review all requirements and timeframes associated with the final Standard	All requirements and associated implementation timeframes in the Employment Standard will be reviewed and incorporated into future workplans and budgets (both operating and capital)	LTC		Ongoing	Ongoing	X

CT – Conventional Transit ST – Specialized Transit

**TABLE IV – FACILITY**

The initiatives set out in the following table were established and completed prior to the standard development process current underway as part of the Accessibility for Ontarians with Disabilities Act. The initiatives in this table will be specifically impacted by the Built Environment Standards, which are currently under development, and are anticipated to be completed sometime in 2009. There may also be implications for the initiatives below from the other AODA standards under development.

Issue	Service	Description	Action	Who	2007	2008	2009	2010
Facility Upgrades - addressing various facilities issues as identified in Regulation 429-07 audit	CT/ST	Audit identified a number of facility issues to be addressed (e.g. door openers missing or not working, accessible service counters being used for other purposes)	Assess options for addressing identified shortfalls and implement necessary changes.	LTC		X	Ongoing	X
Facility Signage -identifying various signage, layout and equipment location issues	CT/ST	Audit identified a number of potential issues with respect to signage requirements	Assess options for addressing identified shortfalls and implement necessary changes.	LTC		X	Ongoing	X
Participate in creation of AODA Built Environment Standard	CT/ST	Participate through AMO resource team to provide stakeholder input to the standard development process	Administration will continue to participate through the AMO resource team to provide stakeholder input to the standard development process. Administration will also continue to keep the Accessible Public Transit Advisory Committee and London Transit Commission abreast of all developments, and seek input where required.	LTC		Ongoing	Ongoing	X
Final AODA Built Environment Standard	CT/ST	Review all requirements and timeframes associated with the final Standard	All requirements and associated implementation timeframes in the Employment Standard will be reviewed and incorporated into future workplans and budgets (both operating and capital)	LTC		Ongoing	Ongoing	X

CT – Conventional Transit ST – Specialized Transit

**TABLE V – INFORMATION AND COMMUNICATION**

The initiatives set out in the following table were established and completed prior to the standard development process current underway as part of the Accessibility for Ontarians with Disabilities Act. The initiatives in this table will be specifically impacted by the Information and Communication Standards, which are currently under development, and are anticipated to be completed sometime in 2008

Issue	Service	Description	Action	Who	2007	2008	2009	2010
Participate in creation of AODA Information and Communication Standard	CT/ST	Participate through AMO resource team to provide stakeholder input to the standard development process	Administration will continue to participate through the AMO resource team to provide stakeholder input to the standard development process.  Administration will also continue to keep the Accessible Public Transit Advisory Committee and London Transit Commission abreast of all developments, and seek input where required.	LTC		Ongoing	Ongoing	X
Final AODA Information and Communication Standard	CT/ST	Review all requirements and timeframes associated with the final Standard	All requirements and associated implementation timeframes in the Employment Standard will be reviewed and incorporated into future workplans and budgets (both operating and capital)	LTC		Ongoing	Ongoing	X

CT – Conventional Transit ST – Specialized Transit

**TABLE VI – CUSTOMER SERVICE**

The initiatives set out in the following table reflect the requirements under the Customer Service Standards, created as part of the Accessibility for Ontarians with Disabilities Act, and subsequently adopted into Regulations 07-429 and 07-430. The actions in this table speak specifically to the requirements in the Customer Service Regulations; however, they are subject to reconciliation with potential future requirements of the remaining AODA standards being developed.

The identified initiatives and implementation timeframes may be subject to change in the future given their consistency with all of the final AODA standards and associated timelines adopted into regulation.

Issue	Service	Description	Action	Who	2008	2009	2010
Establishment of policies, practices and procedures	CT/ST	Every provider of goods or services shall establish policies, practices and procedures governing the provision of its goods or services to persons with disabilities.	Review current policies and practices and update accordingly to ensure compliance. Ensure any costs of implementation are identified in respective budget submissions.	LTC	X	Complete	
Use of service animals and support persons	CT/ST	If a person with a disability is accompanied by a guide dog or other service animal, the provider of goods or services shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises.	Review current policies and practices and update accordingly to ensure compliance. Ensure any costs of implementation are identified in respective budget submissions.	LTC	X	Complete	
	CT/ST	If a person with a disability is accompanied by a support person, the provider of goods or services shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.	Review current policies and practices and update accordingly to ensure compliance. Ensure any costs of implementation are identified in respective budget submissions.	LTC	X	Complete	
	CT/ST	The provider of goods or services may require a person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises.	Review current policies and practices and update accordingly to ensure compliance. Ensure any costs of implementation are identified in respective budget submissions.	LTC	X	Complete	

**TABLE VI – CUSTOMER SERVICE (continued)**

<b>Issue</b>	<b>Service</b>	<b>Description</b>	<b>Action</b>	<b>Who</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>
	CT/ST	If an amount is payable by a person for admission to the premises or in connection with a person's presence at the premises, the provider of goods or services shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person.	Review current policies and practices and update accordingly to ensure compliance and consistency with requirements in the Transportation Standard. Ensure any costs of implementation are identified in respective budget submissions.	LTC	X	Complete	
Notice of temporary disruptions	CT/ST	If, in order to obtain, use or benefit from a provider's goods or services, persons with disabilities usually use particular facilities or services of the provider and if there is a temporary disruption in those facilities or services in whole or in part, the provider shall give notice of the disruption to the public.	Review current policies and practices and update accordingly to ensure compliance, giving consideration to the role the newly installed Automatic Vehicle Locations System and associated Smart Bus Technology may play. Ensure any costs of implementation are identified in respective budget submissions.	LTC	X	Complete	
Training for staff, etc.	CT/ST	Every provider of goods or services shall ensure that the following persons receive training about the provision of its goods or services to persons with disabilities:  1. Every person who deals with members of the public or other third parties on behalf of the provider, whether the person does so as an employee, agent, volunteer or otherwise.	Develop and implement training program for all employees with respect to requirements under this regulation <u>as well as those anticipated under the AODA Transportation Standard.</u>  Ensure any costs of implementation and impacts on manpower and other initiatives are identified in budgets and workplans.	LTC	X	Complete	Ongoing for New Employees
Feedback process for providers of goods or services	CT/ST	Every provider of goods or services shall establish a process for receiving and responding to feedback about the manner in which it provides goods or services to persons with disabilities and shall make information about the process readily available to the public.  The feedback process must permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email or on diskette or otherwise.	Review current customer contact system and update accordingly to ensure compliance giving consideration to the role the newly installed Automatic Vehicle Locations System and associated Smart Bus Technology may play.  Ensure any costs of implementation and impacts on manpower and other initiatives are identified in budgets and workplans.	LTC	X	Complete	

**TABLE VI – CUSTOMER SERVICE (continued)**

<b>Issue</b>	<b>Service</b>	<b>Description</b>	<b>Action</b>	<b>Who</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>
Notice of availability of documents	CT/ST	Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall notify persons to whom it provides goods or services that the documents required by this Regulation are available upon request	Review requirement and assess the most feasible methods for making information public.  Ensure any costs of implementation and impacts on manpower and other initiatives are identified in budgets and workplans.	LTC	X	Complete	
Format of documents	CT/ST	If a provider of goods or services is required by this Regulation to give a copy of a document to a person with a disability, the provider shall give the person the document, or the information contained in the document, in a format that takes into account the person's disability.	Review requirement and assess the various options available for enabling the provision of documents in a number of formats. Ensure any costs of implementation and impacts on manpower and other initiatives are identified in budgets and workplans.	LTC	X	Complete re: CS Std	Ongoing – Info & Comm Std
File Compliance Report with Ministry of Community and Social Services	CT/ST	Complete the online compliance form for Regulation 429/07 indicating compliance by the March 31, 2010 deadline.	Complete Compliance form				X

# **LONDON TRANSIT ACCESSIBLE CUSTOMER SERVICE POLICY**

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## 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 Workplace Safety and Insurance Act, 1997.

#### Nurse

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 or 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 ([www.londontransit.ca](http://www.londontransit.ca)) 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 attaching 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**

<b>1. a)</b> Does your organization have policies, practices and procedures on providing goods or services to people with disabilities? [s. 3(1)]	Yes
<b>1. b)</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
<b>2.</b> 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
<b>3.</b> 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
<b>4.</b> 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
<b>5. a)</b> 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
<b>5. b)</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
<b>6.</b> 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
<b>7.</b> 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
<b>8.</b> Has your organization established and documented a process to receive and respond to feedback on how its goods or services are provided to people with disabilities, including actions that your organization will take when a complaint is received? [s. 7(1), (3) & (4)]	Yes
<b>9.</b> Does your organization make information about its feedback process readily available to the public, 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
<b>10.</b> Does your organization ensure that the following people receive training about providing your goods or services to people with disabilities: <ul style="list-style-type: none"> <li>▪ every person who deals with the public or other third parties on behalf of your organization, and</li> <li>▪ every person who participates in developing your organization's policies, practices and procedures on providing goods or services? [s. 6(1)]</li> </ul>	Yes
<b>11.</b> 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

<p><b>12.</b> 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 trained? [s. 6(5) &amp; (6)]</p>	<p>Yes</p>
<p><b>13.</b> 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) &amp; (2) &amp; 9(1)]</p>	<p>Yes</p>