



***Accessibility Plan –2006 Update  
Appendix C***

***September 2006***

## TABLE OF CONTENTS

I.	Executive Summary	Page 1
II.	London Transit Profile – Conventional and Specialized Services	Page 2-3
III.	Summary of 2006 Work Plan Initiatives	Page 4
IV.	Methodology for Conducting the Annual Update	Page 6
V.	Identified Barriers and Time-phased Action Plan	Page 7-10

## **SECTION I - EXECUTIVE SUMMARY**

This report serves as an update to the London Transit Commission's Accessibility Plan, 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.

As demonstrated, the London Transit Commission is committed to:

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

The activity undertaken in 2006 reflects the continued progress in advancing to the goal of full accessibility in service, facilities, employment and communication undertaken by London Transit since 1992.

In addition to providing an update on 2006 activity, the following report sets out the accessibility work plan that will form part of London Transit's business planning process and related 2007 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.

The approach utilized in the stakeholder consultations and creation of the London Transit Commission's base Accessibility Plan has been recognized as a best practice by the Accessibility Directorate. The key steps of the approach, as well as a copy of the Accessibility Plan, are provided as examples on the Accessibility Directorate's website. The 2005 update will be attached as an Appendix to London Transit's Accessibility Plan.

G. Williams  
Chair, London Transit Commission  
September 2006

## SECTION II - LONDON TRANSIT PROFILE

### *Conventional Services – 2006 Service Profile*

Type of service	Fixed route - modified radial service										
Hours of service	<table><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.
<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.										
Annual passenger trips	18.6 million										
Annual revenue service hours	521,600 hours										
Annual kilometers	10.738 million										
Number of routes	32 routes, plus 3 community bus operations										
Types of services	<p>Mainline Downtown – 10 routes – 6 of which are designated low floor bus accessible</p> <p>Mainline Crosstown – 4 routes, 1 of which is designated low floor accessible</p> <p>Downtown/Suburban – 10 routes, 10 of which are designated low floor bus accessible</p> <p>Feeder/local – 9 routes, 2 of which are designated low floor bus accessible</p> <p>Community Bus – 3 routes, all of which are designated low floor bus accessible</p>										
Fleet makeup	Approved fleet size of 188 buses of which an estimated 135 will be low floor accessible by December 31, 2006										

**Specialized Transit – 2006 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										
Hours of Service	<table border="0"> <thead> <tr> <th><u>Day</u></th> <th><u>Time</u></th> </tr> </thead> <tbody> <tr> <td>Monday to Friday</td> <td>7:00 a.m. to 11:30 p.m.</td> </tr> <tr> <td>Saturday</td> <td>8:30 a.m. to 11:30 p.m.</td> </tr> <tr> <td>Sunday</td> <td>8:30 a.m. to 11:30 p.m.</td> </tr> <tr> <td>Statutory Holiday</td> <td>8:30 a.m. to 11:30 p.m.</td> </tr> </tbody> </table>	<u>Day</u>	<u>Time</u>	Monday to Friday	7:00 a.m. to 11:30 p.m.	Saturday	8:30 a.m. to 11:30 p.m.	Sunday	8:30 a.m. to 11:30 p.m.	Statutory Holiday	8:30 a.m. to 11:30 p.m.
<u>Day</u>	<u>Time</u>										
Monday to Friday	7:00 a.m. to 11:30 p.m.										
Saturday	8:30 a.m. to 11:30 p.m.										
Sunday	8:30 a.m. to 11:30 p.m.										
Statutory Holiday	8:30 a.m. to 11:30 p.m.										
Registrants	2,600										
Annual eligible passenger trips	170,000										
Attendant/companion trips	20,000										
Annual service hours	72,000 - includes both primary and secondary service providers										
Fleet requirements	Fleet requirements are provided by primary and secondary service providers. The primary service provider operates 21 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 170,000 plus trips on an annual basis.</p> <p>Dispatching service – deals with “real time” monitoring of service.</p>										

## **SECTION III - SUMMARY OF 2006 WORK PLAN INITIATIVES**

### ***Ongoing Annual Program Review***

#### *Bus Stops*

As indicated in Table I, issues relating to bus stops (sidewalks, snow clearance, stop design and distance to stops) are reviewed annually and corrective action taken (or scheduled to be addressed) as considered appropriate. This includes liaison with the City of London.

#### *Customer Service/Sensitivity and Awareness Training*

In addition to the revamped new Operator training program, ongoing refresher training is being provided to existing Operations employees. The training program will take up to three years to deliver. An aspect of the training deals specifically with sensitivity and awareness training. By the end of 2006, it is anticipated that 65% of the operators will have completed the training.

### ***Specific 2006 Initiatives***

#### *Service Integration – Conventional and Specialized Services*

In mid 2006, ENTRA Consultants prepared a report on the issues and implications associated with the integration of the conventional and specialized services in London. The key recommendations from the report are set out below.

To promote and expand the integration of the complete family of services offered by LTC, in the context of the Long-Term Transit Service Strategy, ENTRA recommends that the London Transit Commission:

1. Continue the current plan to replace the existing fleet with low-floor accessible vehicles, and consider any opportunities to accelerate the program with available funding.
2. Continue to expand the geographical coverage of the alternative service delivery platforms, such as community bus, to improve access to these services throughout the City, and moderate growing demand for door-to-door paratransit service, while enhancing overall travel mobility.
3. Develop formal service standards for the comprehensive family of services, which establish integrated and consistent policies for existing and proposed services.
4. Establish a series of service integration transfer points, beginning with the transit nodes identified in the Long-Term Transit Strategy. Expand this system of transfer points to include intermediate points on an as warranted basis.
5. Review the existing training programs offered by LTC, for administration staff, operations staff and customers, and compare the program to the preferred framework recommended here. Identify and assess any gaps and consider training strategies to address any gaps that may exist.

With respect to the report recommendations, most are suggesting the continuation of various initiatives previously set out in the action plan attached. Further assessment, and subsequent action plans relating to the report recommendations are scheduled as part of the 2007 work plan.

#### *Service Quantity - Accessible Conventional Service*

Each year, the service is reviewed to consider additional designated accessible routes. Consideration is given to customer requests, travel patterns, and availability of accessible buses. In the fall of 2006, 1 additional route was designated as fully accessible bringing the total to 21 accessible routes or 56% of the conventional service routes being designated accessible.

#### *Specialized Service Improvements*

In late 2006, the scheduled bi-annual Customer Satisfaction Survey for the customers of the Specialized Service will be completed. The questions on the survey will, for the most part, parallel those questions from the 2004 survey so as to provide for relative comparisons.

Customers are asked to respond to a number of questions relating to their satisfaction with various aspects of the specialized service, including demand bookings, subscription bookings, on-time reliability, and driver, call taking and customer service staff courtesy.

Customers are also asked to provide feedback with respect to the service improvements they feel are the highest priority. Results of this section of questions have been used in previous years to make the service improvements which are deemed most important by the customers of the service. The table below sets out the results of the question relating to service improvements from the 2004 survey.

<b>Service Improvement Option</b>	<b>2004 Ranking</b>
Booking Window Reduction	1
Trip Availability	2
Average Ride Time	3
Increased No-Show Wait Time	4

As the table indicates, a reduction in the booking window (currently 3 days in advance of trip) was rated as the number one improvement customers would like to see made to the service, followed closely by trip availability. The review and possible implementation of the move to a reduced booking window was on the 2006 Work Plan, but has been deferred until 2007 as a result of increased pressures on the service relating to a higher than expected registration rate. In the 2006 survey, customers will be asked the same question, with the exception of "increased no-show wait time", which will be replaced with "on-time service reliability".

Customers are also asked questions specific to their use, or reasons for non-use of the accessible conventional service. The results of this section of questions is used to make service adjustments to the accessible conventional service, and also to help determine the next routes to be designated as accessible.

*Ontario Human Rights Commission Staff Position Paper  
Re: Paratransit Service – Special Program Status*

In the spring of 2005, the Ontario Human Rights Commission (OHRC), presented a staff position paper that recommended that the Commission declare that the paratransit services in London, Hamilton, Windsor and Toronto were not special programs as defined by the Code. OHRC staff invited responses to the paper from a number of selected stakeholders including the named systems. Significant time and resources were devoted to the preparation of LTC's response including consultation with the City of London Accessibility Advisory Committee, the Accessible Public Transit Service Advisory Committee, the named systems and respective legal counsels. A response to the paper was filed by the London Transit Commission.

In mid 2006, a decision regarding the position set out in the paper was provided by the OHRC, finding in favour of the staff position paper. The four named properties filed a request for the OHRC to reconsider its finding regarding the special program status of the paratransit services, on the premise that the transit systems had been aggrieved by the decision. Prior to the reconsideration request, the Chief Commissioner publicly reiterated the OHRC position regarding the applicability of special program definition and respective specialized services of each of the named systems.

Subsequent to the public announcement, legal counsel for the named systems advised the OHRC that they had prejudiced any reconsideration and should not hear same, and that the systems would proceed to judicial review of the OHRC decision. An application for judicial review was filed on April 30, 2006.

During the first part of September, OHRC advised that, notwithstanding the public announcement, it was their opinion that the reconsideration was not prejudiced and were proceeding with same; however the Chief Commissioner would not participate in the process. OHRC did not indicate when the reconsideration would be heard.

*Eligibility for Specialized*

The expansion of the eligibility criteria for the Specialized service, to include those individuals with temporary disabilities, was planned to occur in the fall of 2005. This program was put on hold pending the outcome of a paper tabled by the OHRC (see previous paragraph). The program was placed on the Accessibility Plan for 2006, and approved as a 2006 budget and work plan item, for implementation in the fall of 2006.

Commencing in early 2006, the number of registrants being added to the specialized service climbed to approximately 100 per month, and as a result, the demand for service increased significantly. In April of 2006, the decision was made to defer the expansion of eligibility criteria and use the allocated budget to expand the service levels to begin to address the increased demand for service from the current registrants.

The review and assessment of the impacts of expanded eligibility criteria is listed as an action item for 2007, however, actual implementation timeframes will be subject to the outcome of the pending transportation standards associated with the ADOA.

### *Accessibility for Ontarians with Disabilities Act (AODA)*

Throughout 2006, 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.

The transportation specific standards are scheduled to be advanced to the Minister some time in 2007, and expected to become legislation by late 2007. The standards being developed include implementation timeframes for various aspects of both conventional and specialized transit services, and as such, will have a significant impact on the manner in which the services are being provided in various jurisdictions. As a result of the unknown requirements and related timeframes for implementation, no major modifications will be made to either the conventional or specialized services. With respect to the accessible conventional service, continued progress will be made in the designation of accessible routes, as new low-floor buses become available. With respect to the specialized services, focus for 2007 will be to continue to address the challenges associated with the rapidly growing customer base, through the addition of service, in a balanced and measured fashion.

## **SECTION IV - METHODOLOGY FOR ANNUAL UPDATE**

### ***Annual Plan Update***

Each of the items identified as an action step for 2006 were listed on the annual work program, and designated a staff "lead" responsible for the completion of the task.

The Accessible Public Transit Service Advisory Committee, which was established in March of 2004, and is made up of customers of the specialized service as well as individuals interested in the continued progress of accessible public transit in the City of London, provided input on all aspects of the plan. The Committee also provided input on the issues related to specialized service quality.

Further, input received through customer contacts throughout the year was used to update the identified barriers, and assign priorities in terms of timeframe.

The plan was reviewed with representatives from the City of London responsible for the development of their plan, to ensure consistency in tasks and priorities related to transportation.

## **SECTION V - IDENTIFIED BARRIERS AND TIME PHASED ACTION PLAN**

The following tables consolidate the barriers identified through the Accessibility Plan development process. The identified barriers are grouped under the following major categories:

- services
- employment
- facility
- communication

As indicated on the tables, 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 2006. These tables will be updated each year and form part of the appendices for that year's annual update report.

**TABLE 1 – SERVICE**

Issue	Service	Description	Action	Who	2004	2005	2006	2007	2008
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	a) Complete  b) Ongoing	  b) Ongoing	  b) Ongoing	  X	  X
Bus Stops- Snow Clearance	CT	Snow removal is either delayed or not complete in certain situations	Review standards and priorities re snow clearance, in concert with City priorities and recommend amendments to same as appropriate	LTC City	Complete				
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	a) Complete b) Ongoing	b) Ongoing	b) Ongoing	b) X	b) 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	a) Complete b) Ongoing	b) Ongoing	b) Ongoing	b) X	b) 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	2004 Review Complete	X	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	Ongoing	X	X	X	X
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	2004 Review Complete	2005 Review Complete	2006 Review Complete	X	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	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>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>
Fare Parity	ST	<ul style="list-style-type: none"> <li>• Fare media and pricing is different for Specialized services versus Conventional services</li> <li>• Registration fee is a barrier</li> </ul>	As directed by both the London Transit Commission and Municipal Council (Community & Protective Services) the issue of fare parity and elimination of the registration fee will be considered as part of the 2004 budget program	LTC	Complete				
Service Quality	ST  CT/ST	<ul style="list-style-type: none"> <li>a) 3 day advanced booking window</li> <li>b) late/no show policy</li> <li>c) baggage policy</li> <li>d) attendant policy (attendant fare)</li> <li>e) on-time performance</li> <li>f) length of time on vehicle for trips</li> </ul>	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	<ul style="list-style-type: none"> <li>b) Complete</li> <li>c) Complete</li> <li>d) Complete</li> <li>e) Complete</li> <li>f) Complete</li> </ul>		<ul style="list-style-type: none"> <li>a) delayed</li> <li>b) delayed</li> <li>c) delayed</li> <li>d) delayed</li> <li>e) delayed</li> <li>f) delayed</li> </ul>	<ul style="list-style-type: none"> <li>a) X</li> <li>b) X</li> <li>c) X</li> <li>d) X</li> <li>e) X</li> <li>f) X</li> </ul>	
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	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 until 2005	X	Report Completed	X	
Designated Stops at City Parks and Special Event Sites	ST	Currently, several common locations for special events have no designated accessible stops, resulting in confusion during pick-ups and drop-offs during events	Work in conjunction with the City of London to install designated “accessible transit” stops at each of the City’s parks that host special events throughout the year	LTC City of London		Complete			
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	Ongoing	X	Program Established	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>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>
Customer Service	CT/ST	a) Driver/ Operator Awareness	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	a) X	a) Ongoing	a) X	a) X
		b) Fleet reliability (i.e., Accessible buses not Available)			b) Ongoing	b) X	b) Ongoing	b) X	b) X
		c) Public timetables and Schedules				c) X	c) Ongoing	c) X	c) X
Behavioural 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		X	X	X	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	X	X	X	X

CT – Conventional Transit ST – Specialized Transit

**TABLE II - EMPLOYMENT**

Issue	Service	Description	Action	Who	2004	2005	2006	2007	2008
Employment Opportunity Advertising	CT/ST	Lack of indication that those with disabilities are welcome to apply	Revisions in the wording of external advertisements to welcome applications as an Equal Opportunity Employer	LTC	Completed in fall 2003				
Employment Recruiting Agency	CT/ST	Ensure that the agency carries out functions as if the LTC is performing them in terms of dealing with those applicants with disabilities	Clarification of expectations and revision of internal documentation of the contracted Employment Agency	LTC	Completed in fall 2003				
Employment-accommodating selected applicants and employees with disabilities (permanent/temporary)	CT/ST	Workplace accommodation of a range of disabilities	Review, update and implement London Transit's modified work program	LTC	Completed in fall 2003				

**TABLE III – FACILITY**

Issue	Service	Description	Action	Who	2004	2005	2006	2007	2008
Facilities- Visitor Parking	CT/ST	Identified non-conformance with "FADS" on customer service policy	Assess requirement and determine corrective action. Include in 2004 budget program.	LTC	Complete by Dec/04				
Facilities- Access to Customer Service Counters	CT/ST	Identified non-conformance with "FADS"	Assess requirement, include in 2004 operating budget program	LTC	Complete by Dec/04				
Facilities – Accessible Parking Spot/Drop-off	ST	Identified possible non-compliance with "FADS"	Assess requirement and determine corrective action. Include in 2006 budget program.	LTC			Complete by Dec/06		

**TABLE IV - COMMUNICATION**

No identified issues/barriers arose concerning corporate communications. In keeping with London Transit's commitment to the Human Rights Policy, identified individual needs are addressed as they arise. The corporate website will be reviewed to ensure that it meets current standards for accessibility. Consideration is being given to adding a page or pages to the website which describe the accessibility undertakings of the Commission and describe the accessible features of our services, facilities, and our approach to accessible communications and employment practices.

CT – Conventional Transit    ST – Specialized Transit