

11 April 2013

Disabilities Transport Access Secretariat
Transport Access Section
Road Safety and Transport Access Branch
Department of Infrastructure and Transport
GPO Box 594
CANBERRA ACT 2601

Dear Secretariat

REVIEW OF DISABILITY STANDARDS FOR ACCESSIBLE PUBLIC TRANSPORT

Our biggest concern is that the Standard refers to AS1428.2 1992 and needs a complete update to reference the current Standards adopted for National Construction Code and Premises Standard such as:

AS1428.1 2009

AS1428.4.1 2009

AS2890.6 2009

Other specific comments include:

- Part 1.2** Definition should be exactly as per current Standards.
- Part 15 Toilets** Need to include ambulant toilet facilities.
- Part 18 TGSI** References to "colour contrast" should be changed to 'luminance contrast' (this may occur in other parts as well).
- Part 20 Lighting** Levels should reference current Lighting Standards.
- Part 22** Luggage deposit counters at airports require different consideration. The 5% rule in 22.2 needs expansion as to what it means as AS1428.2 does not consider it.
- Part 26** The area of coverage needs to be clear and if it is the whole of a transport facility or just customer seating areas. Other factors to consider are, different transport companies sharing an area or if they share a facility but in different areas and potential interference

Yours faithfully



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Director

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