Dear Disabilities Transport Access Secretariat

Thank you for the opportunity to comment on the Draft Transport Standards Review Report. I offer some comments on the recommendations which I list the recommendations for reference purposes and my comments follow.

- 1. Establish a national framework for reporting on compliance by 30 June 2016
- 2. Modernise the Transport Standards in consultation with stakeholders by 30 June 2016
- 3. Further consideration of the complaints process by the Australian Government
- 4. Develop guidelines for whole-of-journey accessibility
- 5. Develop and implement a national motorised mobility aid labelling scheme
- 6. Develop national wheelchair accessible taxi compliance milestones and response times by 20 June 2016
- 7. Review of the Disability Access Facilitation Plan (in consultation with the Aviation Access Forum) by 30 June 2015

Here are a few comments based on my experience of travelling around Australia on crutches and wheelchair and scooter for at least 15 years:

Overall and recommendation 2

I am disappointed that the recommendations are essentially about compliance and do not address the adequacy of the current standards. Sure recommendation 2 proposes modernising the standards and includes several comments about particular areas where *the Review heard that the standards were inadequate*. But this is accompanied by extended commentary from NSW about why it may not be possible to improve services! And furthermore this is only a recommendation and not an actual commitment to do anything.

Recommendation 4 (guidelines for whole-of-journey accessibility)

There is an urgent need for guidelines as per recommendation 4 because the standard of accessibility varies enormously form State to State and within States and even within single systems in a single city for example it not possible to plan to travel across Melbourne using the tram system because of the variety of trams and tram-stops

Moreover I have tried travelling by train in Melbourne, Sydney and Brisbane during a single trip and the differences are staggering. Melbourne's system for carrying wheelchairs on trains is the best by far and works well the vast majority of the time. But in Sydney because the system relies on station staff being available to place access ramps to the train it is recommended that wheelchair travellers notify the railways 24hrs in advance the time of the train they will arrive on at a particular station!! And in Brisbane I found it frequently impossible to even get on to metropolitan stations in a wheelchair.

Similar differences apply to the bus systems but here I found the Brisbane buses to be best equipped for wheelchair travel.

A problem in Melbourne is that although most regular public buses are equipped to handle wheelchairs many of the older buses have been relegated to servicing events so that if one is going to a golf event one is likely to find that although the train is able to carry wheelchairs when you get off the train many of the event buses from the station to the event are not so equipped. **Recommendation 5** (national motorised mobility aid labelling scheme)

Another urgent requirement because mobility aids are booming which is good because the range of aid available is increasing rapidly. However, aids and are coming from all over the world so there is the possibility of big variations in standards; also I believe the regulations for mobility scooters (at least) vary from State to State in Queensland I notice that many have registration plates but none in Victoria.

Recommendation 6 (national wheelchair accessible taxi compliance milestones and response times)

A key requirement is for these to be performance related and to carry penalties for failure. Most wheelchair accessible taxis I have used have been woefully badly maintained including having seatbelts that could not be used, interior door handles missing and being generally dirty. Fortunately I usually travel with a small folding scooter so I am not forced to use wheelchair accessible taxis.

Recommendation 7 (review of the Disability Access Facilitation Plan, in consultation with the Aviation Access Forum)

One hears many horror stories about lack of availability of spaces for wheelchair travellers on planes. However, my own experiences travelling by air have generally been good but, I have learnt by experience that it is safest to check in my scooter with the rest of my luggage and have it go through the oversize baggage channel. I have found that when I take my scooter to the boarding gate it is far more likely to be damaged in transit.

One aspect of are travel that is rarely commented on is the lack of wheelchair accessible public transport to Melbourne Airport this seems to me to be one of the biggest arguments in favour of a rail link.

Nigel Caswell MS Advocate President of People with MS Victoria Inc