



Disabilities Transport Access Secretariat
Road Safety and Transport Access Branch
Department of Infrastructure and Regional Development
GPO Box 594
Canberra, ACT 2601

10 July 2014

Dear Sir,

Regional Express Holdings Limited is appreciative of the opportunity to provide a submission on the Draft Report – Review of the Disability Standards for Accessible Public Transport 2002.

Regional Express Holdings Limited comprises one (1) aviation training organisation and three (3) aircraft operator companies; Regional Express Pty Limited (Rex) which is a Regular Public Transport operator utilising 45 SAAB 340 aircraft with a 34 seat capacity to 35 airports in 5 states, Pel-Air Aviation Pty Ltd which conducts charter and Government contract operations utilising a variety of aircraft and Air-Link Pty Ltd which operates charter and Regular Public Transport operations within New South Wales with a number of small aircraft of less than 30 seats.

Recommendation 1 – National reporting on compliance.

If annual reporting is to become compulsory, Regional Express will support reporting to a single national authority. Aviation in Australia occurs within multiple government jurisdictions and reporting to a number of state authorities will require duplication of reporting for many aircraft operators.

Regional aviation comprises a number of small minimal staffed airports and airlines where many managers are multi tasked. Disabilities issues are, in many cases, a secondary and not necessarily well understood task for many managers. In the event of compulsory reporting, these operators will require assistance in the form of a reporting template and guidelines.

Recommendation 3 – The complaints process

Regional Express supports streamlining of the complaints process. However, formal conciliation between the complainant and the service provider must be incorporated as the initial step in the process as many issues can be resolved at this stage and save the expense of legal action. Legal action should be the last resort of any complaint process.

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Many service providers maintain a system through which initial complaints can be actioned. The first step in a complaints process should be direct contact with the operator. This is similar to the concept of the Airline Consumer Advocate process initiated by the federal government in July 2012, whereby the passengers could escalate unresolved complaints to an independent body. While the Advocate does not operate within a regulatory framework it has assumed a vital role by ensuring Australian consumers are provided with an easily accessible, responsive and timely complaint resolution process.

Failure of direct negotiation should then escalate to the AHRC conciliation process. In the event of failure of conciliation, Regional Express supports the implementation of the second option of the 2007 review with the AHRC providing greater facilitation of representative complaints.

Recommendation 4 – Whole-of-journey accessibility

Within the discussion of Recommendation 4 is consideration for assistance from kerb side to the check-in counter of an airport. As has been previously stated in other submissions and at the Aviation Access Forum (AAF), Regional Express strongly opposes any requirement that places the responsibility for this assistance to be placed solely on airlines due to limited resources.

Each airport is unique in structure and available resources. Major airports have a capability to provide this assistance through the provision of specifically employed persons as discussed in the AAF and as trialled in two major airports. The AAF has discussed the method of recovering the cost of this service. Smaller airports do not have this capability. At regional locations both the airport and the airlines do not have resources to provide this service on a permanent basis.

As opposed to prescriptive standards dictating the provision of this service by a particular operator, Regional Express supports an outcomes based standard which allows the provision of this service to be outlined in the DAFP of each airport and airline operator. This allows each regional airport and airline to provide the required service commensurate with local conditions provided sufficient notification is made by the passenger.

Regional Express supports further discussion of this issue in the AAF prior to inclusion in the Standards.

Recommendation 5 – National motorised mobility aid labelling scheme

Regional Express strongly supports the implementation of a standardised labelling system for motorised mobility devices. The knowledge of the total weight of an aircraft, including all stores, fuel, passengers, crew, baggage and cargo is critical to the safety of flight. Space within a cargo hold is also limited and must cater for the requirements of all passengers as well as freight which may be carried under contract.



The inclusion of weight and linear dimension information to a label on motorised mobility devices will assist airlines in planning loads and ensuring that the particular aid complies with the limitations of the aircraft, particular as these devices are increasing in weight and size.

Standardised labelling with weight information will allow ground staff to assess a device prior to loading into or unloading from an aircraft. Loading baggage and cargo by many Australian operators requires manual handling and staff must be able to risk assess any load prior to lifting or moving manually to ensure that Workplace Health and safety requirements are complied with.

Recommendation 7 – Review of Disability Access Facilitation Plan

As a member of the Aviation Access Forum, Regional Express supports a review of the Disability Access Facilitation Plan initiative by the Forum.

Regional Express views these recommendations as important to ensure that operators of small passenger aircraft have the ability to maintain the highest level of safety for the travelling public whilst maintaining their obligations under the Disability Standards for Accessible Public Transport 2002 (Transport Standards).

If you require any further information, or clarification of any of the above points, please feel free to contact me on [REDACTED] or [REDACTED]

Yours sincerely,

Derek Trafford
Group Security Manager