

Disability Discrimination Act (DDA) 1992 Disability Standards for Accessible Public Transport (DSAPT) 2002 and Guidelines 2004

FIVE YEAR REVIEW

SUBMISSION from the Director of Public Transport, Department of Infrastructure, Victoria

Introduction

The Victorian Government is fully committed to making public transport more accessible to people with disabilities, recognising that access to public transport is essential to ensure that all Victorians can contribute in the community and reach their potential. This is one of the cornerstones of the Victorian Government's policies and programs supporting people with disabilities and limited mobility, including the *State Disability Plan, A Fairer Victoria* (2005), and *Meeting our Transport Challenges* (2006). The *Accessible Public Transport in Victoria (Action Plan 2006 – 2012)* and related funded programs build on these commitments, as well as the extensive work undertaken already on the state's public transport network, to comply with the Commonwealth Disability Discrimination Act 1992 and accompanying Disability Standards.

This Victorian submission to the Commonwealth Government's Five Year Review of the DDA DSAPT from the Department of Infrastructure (DOI) Public Transport Division (PTD) deals with train, tram, and bus and taxi services managed by the Director for Public Transport. Background to the review is included in Appendix 1.

The Five Year Review of the DSAPT is important to ensuring that the standards are removing or diminishing barriers preventing people with disabilities accessing public transport. It is also necessary to ensure that the implementation of the standards is not having any unforeseen effects on the wider operation of public transport services.

This submission has been developed in consultation with key stakeholders including operators (Connex, Yarra Trams, VLine Passenger, Metlink, Bus Association of Victoria (BAV)), Victorian Taxi Directorate (VTD), VicRoads, the Public Transport Access Committee (PTAC), project managers, and legal and industry stakeholders. It does not deal with aviation, which is regulated by the Commonwealth Government, or jetties and water taxis, which are used primarily for tourism and recreation.

It addresses the Terms of Reference for the Five Year Review of the DSAPT released by the Hon Mark Vaile, Deputy Prime Minister and Minister for Transport and Regional Services (Appendix 2).

It is structured in accordance with the questions raised in the Issues Paper released by Allen Consulting Group, appointed by the Department of Transport and Regional Services (DoTaRS) to conduct the Review.

1.0 Executive Summary

Good progress is being made in Victoria in making public transport more accessible and removing discrimination against people with disabilities. Significant funding to upgrade public transport and provide new services and infrastructure has delivered new trains and trams, low floor buses, major new infrastructure projects such as

Southern Cross Station, regional rail and bus service upgrades, new information and signage systems, a new smart card ticketing system and new infrastructure at train stations, platform tram stops and bus stops. The passing of the DDA DSAPT has assisted all parties to identify their rights and obligations and guided implementation of the technical requirements. Victoria's implementation progress is widely publicised through the state Action Plan 2006 – 2012 and the DOI web site. Regular consultation with people with disabilities and operators and stakeholders has assisted the development of workable solutions.

The first five years of progress have built on past legacies but the requirements are complex with far reaching implications for many parties and across several jurisdictions. Therefore initial progress implementing the DSAPT has been limited with some outcomes seeming a little disjointed across the whole system to users. Technology has provided some unexpected improvements in access for people with disabilities, particularly IT systems, mobile phones and information. A number of problems with the DSAPT have been identified – requirements which are unclear, technically unachievable or conflict with other regulatory, safety or operational requirements – and need to be addressed as soon as possible. A number of longer term implications have also been identified which need to be considered as a matter of priority.

A clear need for improved customer service and disability awareness training has become evident. There is a considerable education and training task to be continued across large numbers of providers, operators, stakeholders and passengers, as well as their related support and advocacy agencies.

Processes including certification of compliance, exemptions and complaints handling are all in early stages of operation yet a number of issues have been identified for review. The approaching 31 December 2007 milestone also highlights the need to undertake this review and consider interim arrangements for complaints handling pending its outcome.

2.0 Structure of public transport in Victoria

Victoria's public transport is a key part of the state's infrastructure. PTD's role, working within the DOI, is to deliver the Government's outcomes and meet its objectives for Victoria's train, tram, bus, taxi, hire car and accident tow truck services. Its mission is to deliver safe, reliable and accessible public transport. Approximately 364 million trips are made by public transport each year.

Day to day operations within Victoria's public transport industry have either been traditionally provided by the private sector or have been substantially outsourced to private operators during the last ten years. PTD's role is not to provide the public transport services, but to manage contractual and regulatory relationships effectively in order to meet the Government's objectives. PTD works closely with other parts of Government, with local councils, and external community groups.

Currently private operators deliver public transport services under contract to the Government as follows:

- Metropolitan train services – Connex
- Tram services – Yarra Trams
- Regional train services – VLine Passenger

- Information, marketing, signage (one stop shop) – Metlink
- Bus services – various private operators
- Taxi – private operators regulated by government.

All operators are required to meet the aspects of the DDA DSAPT relevant to their own operation. Operators are responsible for all aspects of staff training and operational protocols and for facilitating relevant capital expenditure. The Victorian Government generally funds major capital works on the tram, train and bus networks either directly through the contracts with operators or as State funded works programs.

3.0 Victorian progress in improving accessible public transport

Approximately 20 percent of the Victorian population has some form of disability. Victorian Government policy as set out in the State Disability Plan reaffirms the rights of people with a disability to live and participate in the community. The government's commitment to inclusion and integration is reflected in its approach to public transport accessibility. Every component of the government's involvement in the delivery of public transport services is expected to contribute towards the achievement of this goal.

Victoria has made good progress in improving access to public transport for people with disabilities and implementing the requirements of the DSAPT. Current progress achieved is identified in the DDA Compliance Matrix as at June 2006 (Appendix 3).

Further progress and programs being implemented are identified in the *Accessible Public Transport in Victoria, Action Plan 2006 – 2012* launched by the Minister for Transport in September 2006. The Action Plan identifies the scope of work to be undertaken to meet the requirements of the 2007 and 2012 milestones. It is supported by programs announced by the Government under *Meeting our Transport Challenges* (MOTC) including a commitment of \$250m over ten years for upgrades to infrastructure. Other investments include new trains, tram and buses, and major projects and upgrades of public transport services. Development of this plan included high levels of consultation with operators, other agencies including VicRoads, PTAC and people with disabilities. A summary of the actions outlined in this report is provided in Appendix 4.

Victoria expects to meet most requirements for trains, stations, buses, and bus stops set out in the 31 December 2007 milestone. Programs are in place to rectify instances of insufficient compliance. For example, new low-floor trams are to be purchased, and a significant construction program of platform tram stops is underway. New standards have been developed for access at pedestrian rail level crossings and are being implemented through upgrade programs in metropolitan and regional areas. Taxi response times for wheelchair accessible taxis are being managed operationally to achieve the best possible outcomes. Progress in implementation against the milestones is regularly reported to PTAC (a stakeholder consultative forum appointed by the Minister for Public Transport – see Appendix 5 for the membership) and publicly through the DOI website, so progress is widely known.

There is recognition that the benefits of more accessible public transport apply to all passengers and operators, including faster safer loading, reduced trips and falls, and more efficient use of public transport.

4.0 DDA DSAPT Review Issues paper

This submission is structured in response to the questions posed in the Issues Paper released by the Allen Consulting Group. There are five Key Issues identified in the paper with 28 questions posed throughout for response.

A detailed response is provided in Appendix 6, including operator and PTAC comments, and a summary is provided below.

Comments also derive from PTD's broad experience in the provision and operation of public transport services, implementation of the DDA DSAPT since they were developed in draft format, and wide consultation with operators, users and other agencies.

Key Issues

4.1 Achievement of public transport accessibility

Victorian progress in implementing the requirements of the DSAPT has been considerable.

Current data in relation to Victoria's level of compliance with the DSAPT has been widely publicised through the new Action Plan and DOI web site, with progress against all DSAPT Parts and milestones provided. There are some limits to the data elaborated in the Appendices.

Guidelines have been developed to ensure reporting and data are consistent and could be expanded to reflect patronage levels.

Anecdotal evidence suggests increased patronage by people with disabilities.

4.2 Clarification of rights and obligations

Public transport users advise that the introduction of the DSAPT has helped people to better understand their rights. However, fully understanding these rights requires considerable analysis of the DSAPT and Guidelines. There is still considerable need for improved understanding of the rights and obligations of transport providers and users under the DSAPT throughout the community. The Commonwealth Government could greatly assist in this regard.

Transport operators advise that the DSAPT have clarified their obligations. However, there are many areas of the DSAPT which operators believe are unclear. These are identified in the Appendices.

Exemptions have clarified some of the obligations imposed under the DSAPT where the standards were ambiguous or in conflict with other (especially safety) legislation. However, as exemptions can only last for five years and are usually operator specific, they are no substitute for clarity in the underlying regulations.

4.3 Flexibility of approach

The level of flexibility available in achieving compliance has proved satisfactory, but the process whereby it is provided is still being established.

The DSAPT requirements and the Australian Standards technical requirements together do not provide an entirely satisfactory mechanism for achieving compliance. They are cumbersome to use, over-prescriptive in some areas, and unclear or silent in others. Examples where the mechanism is not appropriate are included in the Appendices. Several Parts have requirements which are impractical or impossible to implement.

Users have indicated that improved customer service and information would greatly assist accessibility. In addition, users have pointed out that access across a whole journey is crucial. The standards have minimal regard to passenger use or whole of journey issues.

4.4 Consistency of approach

Implementation of DSAPT requirements in Victoria has not been achieved at consistent rates across all modes due to inherent modal differences. It is easier and more cost-effective to make some modes fully accessible than others, for a number of reasons. Economic life of conveyances, the age and legacy of historic infrastructure, decision making cycles, economic circumstances and jurisdictional responsibilities are all contributing factors.

In Victoria the train system has achieved very high levels of accessibility with recently purchased new rolling stock, ramp based stations, and some major infrastructure upgrades. Pedestrian rail level crossings present a major challenge.

The bus replacement program operating for some years has driven a high compliance rate of around 50% for low floor buses. Bus-stop infrastructure is more challenging because of different jurisdictions and the sheer number of stops.

Trams are also a major challenge, as the vehicles are high-floor with an economic life of some 35 years, with heritage trams still operating after more than 80 years. Most tram boarding occurs in mixed traffic conditions in the middle of the road, so tram stop infrastructure requires significant change.

Areas of inconsistency are constantly being addressed and will become less apparent over time as greater levels of accessibility are achieved. Current exemptions have been appropriate, but their value is only in permitting a delay in resolving the problem. The length of time is generally inconsequential in mass transit public transport service terms, but for smaller operators an implementation delay may be quite beneficial.

4.5 Compatibility of approach

The DSAPT are designed for people who, despite their disability, can be expected to access the transport system independently. In Victoria people who are not able to use the public transport system independently may take their carers free under the Companion Card scheme managed by the Department of Human Services. Registered users with a valid ticket may take their carers on public transport throughout the State free. Under the Multi-Purpose Taxi Program for people with severe and permanent disability the Government subsidises half the taxi fare up to a maximum of \$30 per trip, and an annual cap of \$1030 (for some users the annual cap does not apply). The Government also provides funding support to the Travellers

Aid Society which provides travel assistance to individuals, including people with disabilities.

The milestones do provide for gradual improvement over the 30 year implementation period, but there are compatibility problems in the later stages. Initially progress can be made at every opportunity, so the alignment of accessible vehicles and infrastructure can be somewhat ad hoc. Every effort is made to coordinate improvements, but infrastructure may be upgraded where the vehicles are not and vice versa. The mechanisms and cycles to upgrade each are different and often involve different jurisdictions with varying priorities. Over time the match can be expected to improve.

There is a significant mis-match between the milestones for trains and trams (30 years) and related infrastructure (20 years) which may prove unworkable, particularly for tram services. The milestones require a heavily weighted replacement rate for trains and trams, by providing 15 years to replace 90% of vehicles and another 15 years to replace the last 10% of vehicles. This does not fit comfortably with vehicle replacement programs or cycles. While this is not a significant issue for trains in Victoria (which are already virtually fully compliant), in the case of trams, older rolling stock cannot be retro-fitted. A more even roll out of replacement vehicles across the 30 years could be considered, whilst achieving the same final result of full compliance by 2032. This could achieve better integrated outcomes between vehicles and infrastructure, provided that it is progressed in consultation with people with disabilities.

The Victorian Government has consistently stated that it believes the best way to achieve compliance in the tram network is a combination of construction of platform stops and the replacement of older high floor trams with new low floor trams equipped with wheelchair lifts. The age profile of the existing tram fleet in Melbourne means that although the final milestone is acceptable, the intermediate milestones are not linked with a serious replacement programme. People with disabilities and their advocates have clearly articulated to Government that they do not support extended timeframes for compliance.

Providers and operators are seeking to meet their obligations across all aspects of accessibility. Good progress is being made in Victoria, but there are some inherent difficulties. They include providing wheelchair access to trams, achieving consistency across all systems, the cost, time and disruption to services from upgrading infrastructure in an operating environment, communicating changes to services and emergency transport situations, and response times for some wheelchair accessible taxi services. There is clearly more work required to improve customer service and disability awareness training.

The DSAPT need to more explicitly recognise other regulatory constraints that impede implementation. These include Occupational Health and Safety, public transport safety and operational Standards and Rules, Road and Traffic regulations, restraints and seat belt legislation, the Building Code of Australia, and Heritage legislation.

4.6 Certainty of process

The HREOC complaints process is not well understood by the public and is often confused with other complaints processes. These include operator customer feedback systems, the Victorian Public Transport Ombudsman (who deals with

referred complaints not satisfactorily resolved by operators), and complaints under State Equal Opportunity legislation. Victoria has received HREOC complaints in relation to safety at pedestrian rail level crossings, accessible taxi services and tram access.

HREOC complaints processes are costly and time-consuming for all parties involved. It is a substantial task for providers and operators to communicate all the data and issues associated with a complaint. There can be duplication between operators and agencies as the jurisdictional issues may not be clear. Litigation is widely regarded as an unfortunate diversion of scarce funding for accessible public transport to the legal system.

HREOC is highly regarded as a source of assistance and has provided valuable discussion and information on its web site. In Victoria information on accessible public transport is widely available, with Metlink providing a 'one stop shop' for public transport information for all passengers throughout the state. DOI and operators provide policy and operational information via web sites, media releases, radio, sms, audio, publications, and reports in accessible formats. Victoria has released its full compliance data across all Parts of the DSAPT, for conveyances, premises and infrastructure and for all milestones to 2032.

5.0 Key points

IMPLEMENTATION PROGRESS

1. **Progress** - Significant improvements in access to public transport for people with disabilities have been achieved by all parties since the passing of the DSAPT.
2. **An integrated approach** - Victoria has adopted the policy position of integrating accessibility issues within each discipline, operator, mode or system to broaden the range of people and services interacting with people with disabilities and accommodating their public transport requirements. The DSAPT apply to individual operators, but responsibility for ensuring compliance across the public transport system rests with the State Government.
3. **Balancing conflicting demands** - A constant balance is required between the rights and needs of the users and the obligations and capacities of operators and providers. For people with disabilities the time frame for compliance means that the improvements in access are sometimes perceived to lack consistency, connectedness, and extent. However for operators the flexibility within the standards to achieve compliance over time and within normal business processes, as far as practicable, has significant cost advantages and provides wider passenger benefits.
4. **Consultation** - Regular consultation with people with disabilities at strategic and project levels has demonstrated mutual benefits in identifying workable practices and priorities for access and upgrading infrastructure.
5. **Reporting compliance** - Reporting compliance is a huge asset management task. It involves some thirty or more attributes across thousands of assets, with all data progressively changing as upgrades are made. In some cases comparable data is not available (eg response times for taxis from depots). In others measuring compliance between and across

modes requires extensive liaison to achieve consistent data. The APTNAC and APTJC have greatly assisted jurisdictions in clarifying requirements.

6. **Patronage** - Compliance reporting does not currently reflect patronage levels on public transport, which would demonstrate that considerably higher levels of access (and compliance) per passenger are being achieved. Meeting the requirements of the later milestones will become more difficult and costly, and will be more challenging for justification of public expenditure as the cost increases but relative benefits start to diminish.

CLARIFICATION OF RIGHTS AND OBLIGATIONS

7. **Technical challenges** - For operators and providers the requirements of the DSAPT present a considerable technical challenge and a huge learning exercise for everyone. For some operators and providers the requirements have been straightforward. For other services the challenges have been insurmountable, such as eliminating flange gaps at pedestrian rail level crossings, and extremely difficult and expensive, such as providing wheelchair access to trams.
8. **Many Stakeholders** - DSAPT requirements are complex, with costly and far reaching implications for a large number of stakeholders. The service delivery obligations on providers and operators of public transport extend to related agencies providing supporting infrastructure, industry designing and developing new and upgraded conveyances, premises and infrastructure, and staff and other public transport passengers. Obligations to people with disabilities capable of using public transport independently extend further to those requiring assistance from operators and carers. They also involve related support agencies providing travel training, mobility aids and advocacy services. Education of all parties and dissemination of knowledge on best practice as well as implementation progress is an ongoing process.
9. **Format and Structure of DSAPT** - The structure of the DSAPT by reference to versions of Australian Standards by date and clause is necessary to define complex requirements for implementation over a 30 year timeframe. However, this structure is too complicated for general use by the many providers, operators and users. Cross-referencing to Australian Standards can be complex and time-consuming, even where a relatively straightforward requirement is involved. The Australian Standards are not readily available and are too expensive for the general public to obtain. PTD and other agencies have had to develop simplified Guidelines to clarify the requirements.
10. **Anomalies** - There are a number of requirements in the DSAPT which cannot be implemented without further definition, clarification and amendment. For example, landings on ramps are allowed every nine metres under the Building Code of Australia whereas the DSAPT refers to both nine and six metres. Similarly, the DSAPT do not accommodate the gap required between a footpath and a rail track to safely allow the wheel flange to pass. The application of interior lighting standards is not always appropriate in external environments. The requirements for signage viewed closer than 2.0m are not clear.
11. **Inappropriate applications** – There are several instances where the application of building design standards developed for static construction does not translate well to the vibrant moving world of mass public transport. The tolerances required for civil works construction, aspects of moving vehicles and the associated risks for passengers require further consideration

and review. Examples of problematic standards include the size of toilet cubicles on regional trains, and the width of the gaps allowed between train and tram carriages and platforms.

12. **Technology gaps** - The DSAPT do not address many technological innovations which are providing improved, flexible and convenient solutions to access to public transport. Examples include smart card technology and proximity readers and touch screens being developed for 'Myki', the new ticketing system in Victoria, real time information and other IT - based systems.
13. **Information** – The DSAPT do not deal with information issues well. Many issues including time tables, accessible formats, size of print, and timetabling of accessible services are not adequately addressed.
14. **Consultative technical amendments process** - A consultative process to amend the considerable technical detail in the DSAPT would seem warranted.
15. **Responsibility** - The responsibility for DDA compliance as between states, local councils, operators and other stakeholders is not adequately dealt with by the DSAPT. This varies across Australia, yet agreement of all stakeholders is a major factor in the capacity of the party responsible under the DSAPT to implement the requirements. Victoria has undertaken considerable work to identify responsibility for DDA compliance in the context of the new state Road Management Act and Codes of Practice impacting on road authorities and service providers. Coordination of the components required for continuous accessible travel becomes complex when several major agencies must be involved. The role of local government is also significant in supporting 'whole of trip' accessibility. Jurisdictional issues are similarly complex in relation to aviation, and ferry services providing public transport.

FLEXIBILITY OF APPROACH

16. **Staff training and people's attitudes** - For many people with disabilities the attitudes and disability awareness of customer service staff and those providing direct assistance greatly impact on their access and travel experience. The DSAPT focus on the technical/physical side of access, but the "softer" aspects such as staff attitude and expertise are not addressed.
17. **One size fits all** – There is no hierarchy embodied in the DSAPT so the same standard applies wherever the service is located, in a complex dense city or a remote country town.
18. **Certification** - The lack of sign-off or certification is problematic in the transport industry given the requirement for long lead times and large financial commitments. Designers, specifiers, manufacturers and operators all seek clarification and certainty of compliance throughout all processes, and certainly before delivery of a finished product, which may have been more than five years in development.
The APTNAC and APTJC Committees have proved valuable mechanisms for individual jurisdictions and organisations during the first five years of the operation of the standards. However, the reporting structure and functionality of the groups and their relationship to DoTaRS has not enabled resolution of many of the compliance issues raised from time to time. HREOC has provided valuable leadership in relation to complaints and exemptions, but has not been able to determine some issues. The Review should consider some form of referral and determination process in relation to the standards, similar to Building Referees panels in building permit processes.

CONSISTENCY

19. **Inconsistencies across modes** have developed reflecting ease of implementation due to modal characteristics. For example, buses have much higher levels of replacement than trams due to lower costs of replacement and shorter economic life. The DSAPT treat buses and trams in the same way until the 90% milestone.
20. **Connectivity** - Connectivity is a challenge for operators and providers in the early stages. As higher levels of accessibility across more parts of the whole system are achieved connectivity problems will diminish. Upgrading infrastructure across the state requires a steady sustained program. Acquisition of new conveyances provides significant impact in a short timeframe, once delivery commences at the end of long acquisition lead times. Similarly, reliable scheduling of accessible vehicles is more difficult in the earlier phases when there are only a few accessible vehicles in an entire fleet.
21. **Rural Areas** - Accessible service issues are heightened in rural areas due to lower levels of patronage and services and more expensive taxi services due to long distances.
22. **Exemptions** - Exemptions are of limited value due to their short and temporary nature.
23. **National Consistency** - National consistency is facilitated by jurisdictional co-operation and sharing of information through APTNAC and APTJC, SCOT and ATC, and at service and project levels. Examples of cooperative approaches and information sharing include reporting mechanisms, Queensland lifts at stations, new Victorian standards for pedestrian rail level crossings, and smart card international research).

COMPATIBILITY OF APPROACH

24. **Conflicts** - Some DSAPT requirements conflict with other regulations or requirements such as Occupational Health and Safety legislation, heritage legislation, and operational and safety practices in the transport industry. Examples include raised identity numbers on the outside of taxi doors, scooters being loaded as luggage on buses, and providing direct assistance to people using mobility aids on steep 1 in 4 ramps. The provision of two allocated spaces at the front of buses for people using wheelchairs has led to increased safety concern for them and other passengers in the event of sharp breaking or swerving. The need for restraints for wheelchairs and scooters on buses may need review. The issue of restraints on scooters remains controversial.
25. **Heritage legislation** - Heritage legislation generates further conflicts and anomalies with access requirements and the DSAPT, although Victoria acknowledges that compliance can usually be achieved without compromising heritage significance.
26. **Compliance timeframes** - The compliance timeframe as originally designed has little capacity to anticipate government funding cycles, fleet replacement cycles, trends in passenger transport services and demand, or the relationship between the roll out of conveyances and infrastructure. The DSAPT provide 15 years to achieve 90% compliance for trains and trams then another 15 years for the remaining 10% compliance, and only 20 years for the related infrastructure (particularly trams stops and tracks). Review and clarification of these later timeframes is warranted in association with the

states and territories and providers and operators, and people with disabilities, for better balance and flexibility in the relationship between the two components of the service. The gaps between trains and trams and platforms are particularly problematic due to the inter-relationship between the vehicle and the infrastructure.

CERTAINTY OF PROCESS

27. **Complaints** - Complaints processes operate under several jurisdictions in Victoria including through individual operators, the Public Transport Division of the Department of Infrastructure, the Public Transport Ombudsman and Victorian Equal Opportunity and Human Rights Commission as well as HREOC under the DSAPT. Reducing overlap and duplication in this area is worthy of further consideration.
28. **Link Review Outcomes to Complaints after 31 December 2007** - Some mechanism may be warranted to relate the pending outcomes from the Review with complaints which arise after the passing of the first milestone in 31 December 2007.

6.0 Recommendations

1. That the current scope and level of access contained in the DSAPT generally be retained and continued, as progress is being made and all parties are becoming familiar with the scope and implications of the requirements.
2. That a number of anomalies, gaps, and inconsistencies in the DSAPT be clarified and removed through a consultative amendment process.
3. That the conflicts between the DSAPT and other safety, operational and legislative and regulatory mechanisms be identified and reconciled through a consultative amendment process.
4. That cross-referencing with Australian Standards be reviewed to allow specification of straightforward meaningful performance requirements in one comprehensive document.
5. That a hierarchy of appropriate access treatments be differentiated for application across situations ranging from mass transport to remote and low patronage locations and individual door-to-door services.
6. That the unique access issues related to the Melbourne tram network be recognised under the DSAPT, particularly due to the operation of vehicles in the centre of the roadway in mixed traffic rather than in the dedicated reserves of heavy rail trains.
7. That the requirements for the longer term milestones be reviewed now, recognizing the relationship to patronage levels, and that as early milestones are met, the later ones become more difficult, disruptive and expensive to achieve for potentially significantly lower benefit.
8. That the timeframes for compliance be reviewed in relation to trams to provide a more even roll-out for the replacement of conveyances through the middle milestones of 55% by 2012 and 90% by 2017 across the thirty years to 2032. The end result would be the same yet would reflect government funding cycles under value for money principles. A process separate from this Review may be required to include consultation with people with disabilities to balance policy, operations, funding and user requirements.
9. That requirements for reporting compliance be clarified, and the possibility of including patronage levels be investigated.

10. That responsibility for DDA compliance within complex jurisdictions be clarified across all levels of government and industry.
11. That interim arrangements for complaints following the passing of the 31 December 2007 milestone be considered pending the outcomes from this Review.

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Appendices

Appendix 1 Background

The *Disability Discrimination Act (DDA) 1992* seeks to eliminate discrimination as far as possible against people with disabilities in providing services such as public transport. The *Disability Standards for Accessible Public Transport (DSAPT) 2002* (the 'Transport Standards') set out requirements and milestones to be met to assist providers and operators to remove discrimination from public transport services. There are 30 technical Parts with references to Australian Standards which apply to conveyances, premises and infrastructure used in providing train, tram, bus, taxi, and ferry and aviation services.

Schedule 1 sets out milestones for implementation, with broadly 25% compliance required by 2007, 55% by 2012, 90% by 2017 and full compliance by 2022. Some Parts require full compliance by 2007 or 2012, and trains and trams have until 2032 to achieve full compliance. The 'Transport Standards' apply to all new works and services introduced after 2002. Existing conveyances, premises and infrastructure must be retrofitted or replaced in accordance with the milestones.

Part 34 of the 'Transport Standards' requires the (Commonwealth) Minister for Transport and Regional Services, in consultation with the Attorney-General, to review their efficiency and effectiveness within five years of their taking effect, with subsequent reviews every five years. Accordingly, Terms of Reference (ToR) for the Five Year Review (the Review') were released by the Hon Mark Vaile Deputy Prime Minister and Minister for Transport and Regional Services on 3 January 2007 (Attachment 2).

The Department of Transport and Regional Services (DoTaRS) appointed Allen Consulting Group to conduct the Review. They have established a web site, released an issues paper, and invited submissions from all parties by 24 August 2007. Submissions will be made public unless specifically marked confidential. Allen Consulting will conduct public hearings in all capital cities and regional centres across Australia in July and August 2007. They will consider all submissions and prepare and circulate a draft report to stakeholders for comment. They will then submit a final Report by 14 December 2007 for consideration by the Minister for Transport and Regional Services in consultation with the Attorney-General.

Appendix 2 Terms of Reference (paraphrased)

In relation to the efficiency and effectiveness of the Transport Standards the review will consider:

- the adequacy of the current structure and processes
- the suitability of other approaches
- the impact of the current incorporation of references to Australian Standards
- an assessment for each Part of the DSAPT.
- the extent to which unjustifiable hardship or equivalent access provisions are being utilised by service providers and/or operators.
- issues of promoting national consistency, efficient regulatory administration and compliance.

In relation to whether discrimination has been removed as far as possible, the Review will:

- concentrate on compliance requirements at the initial 31 December 2007 target date
- collect and analyse the available data and other information on compliance.
- assess the scope and value of current compliance information
- consider any implications for the assessment of whether discrimination has been removed.

In relation to Amendments to the Transport Standards, the Review will:

- identify amendments for each Part of the Transport Standards.
- identify costs and benefits to stakeholders.
- take into account the issues of promoting national consistency, efficient regulatory administration and compliance.

The Review will also include appropriate recommendations for amendments to the Guidelines.

The Review process will include:

- national consultation with all levels of government and affected parties (people with disabilities and their representatives, community interest groups and industry).
- invitation of stakeholder submissions to be made publicly available.
- facilitation of participation by people with disabilities including using accessible venues and providing documentation and information in alternative formats.
- a list of stakeholders consulted to be included in the final written report.

Appendix 3 DDA Compliance Matrix as at June 2006

Standards area	Percentage compliant with DSAPT											
	Melbourne Trains		Melbourne Trams		Melbourne Buses 2005		V/Line Trains		V/Line Coaches		Regional buses 2005	
	Infrastructure	Vehicles	Infrastructure	Vehicles	Infrastructure Est - Metlink*	Vehicles	Infrastructure	Vehicles	Infrastructure Est - Metlink*	Vehicles	Infrastructure Est - Metlink*	Vehicles
2 Access paths	15a		87	21	54		40	79	40		19	
3 Manoeuvring areas	70	100	79	21	38	48	99	80	45	35	20	39
4 Passing areas	75		79		50		89	56	40*		20*	
5 Resting points	86						69					
6 Ramps	23	100	100	21	53	48	37	100	100*	35	50	39
7 Waiting areas	53		100		50		84		44*		27*	
8 Boarding	96	100	7	3	33		94	100	44*	35	25*	
9 Allocated space		100	89	21	52	48		56	44	35	27	39
10 Surfaces	64	100	87	100	43	48	65	79	44	35	25	39
11 Handrails and grabrails	76	100	100	100		48	30	65		35		39
12 Doorways and doors	88	100		100		48	81	56		35		39
13 Lifts	100						100					
14 Stairs	35			21			64					
15 Toilets	82						74	86				
16 Symbols - c	98	50b	100	21		100	98	100		100		100
17 Signs - c	98	50b	100	100	100	100	100	100	100*	100	50*	100
18 Tactile ground surface indicators	22		7		4		13		10		5	
19 Alarms	100						100	100				
20 Lighting	95	100		37		48g	6	100		35g		39g
21 Controls	57	100		100			38	86				
22 Furniture and fittings	100d						8					
23 Street furniture (seats)	64		100		75		93		50		60*	
24 Gateways	100						97					
25 Payment of fares - e	100		100	100		100	100	100		100		100
26 Hearing augmentation - i	100	100	100	13		100	14	100		100		100
27 Information - c	96	100	100	100	100	100	100	100	100	100	100	100
28 Booked services								100		100		
29 Food and drink services	28f						40f*	100h				
30 Belongings		100						100		100		
31 Priority seating		100		100		100		100		100		100

KEY

Black	Not applicable
Green	Fully accessible
Red	Not met 2007 Milestone
Orange	Met 2007 but not 2012 Milestone
Yellow	Met 2012 Milestone

NOTES:

MOTC Funded Programs are planned to achieve the 2007 milestone (except late for tram stops) and make pro rata progress towards the 2012 milestone, for infrastructure, with separate programs to progress compliance for vehicles.

* Estimate

a Access path compliance relies on pedestrian crossing upgrades.

b Connex is managing a program for compliance on trains.

c Parts 16 Symbols, 17 Signs and 27 Information should meet 100% by 2007 through Metlink's contract for metropolitan train, tram and bus services and general public transport information.

d Connex meets by direct assistance.

e Part 25 Payment of fares should be met by 2012 through the new TTA ticketing system to be introduced from 2007.

f Part 29 compliance relies on sub lease compliance.

g Compliance may be higher if older buses comply.

h V/Line meets by direct assistance.

i Hearing augmentation is deemed met either with visual information or direct assistance from a driver.

The information in the above table is from various sources including audits and best estimates (bus stops) and is regularly updated.

Appendix 4

Accessible Public Transport in Victoria – Action Plan 2006 – 2012

(The full document is on the DOI web site www.doi.vic.gov.au)

'Extract' Summary of Actions

Table 10-1 summarises the required actions plan for achieving accessible public transport, with primary responsibilities and proposed timing included.

Table 10-1: Actions required for accessible public transport

Area	Action	Responsibility	Timing
Policy and planning	1 Continue to resource accessible public transport in Victoria.	DOI	Ongoing
	2 Continue to develop knowledge and understanding of the requirements of the DSAPT to achieve compliance on all new and upgraded works and services.	DOI	ongoing
	3 Continue to consult with people with disabilities primarily through regular meetings of the Public Transport Access Committee (PTAC) in ensuring that the interests of people with disabilities are fully accounted for in public transport planning and operations.	DOI, PTAC	
	4 Undertake consultations with stakeholders on the DSAPT, make international comparisons and prepare a submission to DOTARS as part of the Five Year Review on areas where the standards can be improved.	DOI	2006/07
Information	5 Complete the Metlink roll out of metropolitan signage and address regional signage changes.		
	6 Continue to provide compliant Metlink whole-of-state information about accessible public transport services in Victoria and develop the Journey Planner.	DOI Metlink	End 2007
	7 Continuously improve services for people with disabilities through consultation (PTAC or other means) and communication of the latest improvements, encourage use of new facilities and seek feedback on experiences gained.	DOI	Ongoing
	8 Coordinate public transport improvements with other programs and improvements in facilities for people with disabilities with VicRoads, local government and other stakeholders.	DOI, VicRoads, Councils	Ongoing
	9 Implement the whole of government strategy in relation to design and standards for wheelchairs and mobility aids on public transport in Victoria.	DPC,DHS,DOI	2006/07
	10 Complete the Wheelchair Safety at Pedestrian Rail Level Crossings Task Force Action Plan	DOI	2006
Ticketing	11 Ensure that the new ticketing system is fully accessible.	DOI	End 2007
Monitoring and reporting progress	12 Develop and implement an effective monitoring and reporting process for each component of the DDA Action Plan to ensure that progress, learning and statutory reporting needs are fulfilled. Error! Reference source not found.		
Melbourne trains	13 Finalise the draft Standard for Pedestrian Rail Level Crossings for State and national adoption, and implement a program to upgrade all existing rail level crossings to the new standard.	DOI,,Connex	End 2008

Area	Action	Responsibility	Timing
	14 Continue the program of platform widening at the narrow ends of stations ahead of the milestones to alleviate manoeuvring limitations for people using wheelchairs and scooters boarding trains.	DOI, Connex	ongoing
	15 Complete the program of access path and ramp works required to meet the 2007 and 2012 milestones.	Connex, DOI	2007/ 2012
	16 Establish the strategy for full accessibility to be provided to stations beyond 2012.	Connex, DOI	20012
	17 Continue the works program to achieve compliance for stairs.	DOI, Connex	2007/ 2012
	18 Continue the current program of TGSI installation at train stations to meet the 2007 and 2012 milestones.	Connex, DOI	2007/ 2012
	19 Implement lighting upgrades as required (eg at City Loop stations) to meet the 2007 milestone.	Connex, DOI	2007
	20 Complete investigations into hearing augmentation solutions for stations and in trains, and develop an implementation plan to meet the standards as far as possible.	Connex, DOI	2007
	21 Improve passenger information displays (PIDs) at major and junction stations and investigate a visual display to complement the audible 'next train' service at suburban stations.	Connex, DOI	2007
	22 Complete the review of food and drink services.	Connex, DOI	2007
	23 Develop and implement a program to upgrade symbols and signs on Melbourne trains to accessibility standards.	Connex, DOI	2007
Melbourne trams	24 Adopt level access stops as the preferred solution for tram boarding wherever practicable.	DOI, VicRoads, Councils	2007 ongoing
	25 Develop standards for the installation of level access stops including desirable and minimum dimensions for platforms and further develop the tram "toolkit" to provide road planners guidance as to where various solutions can be applied.	DOI, VicRoads, Councils	Mid 2006
	26 Continue to increase the number of level access stops achieved through opportunities through other programs, road upgrades, development projects and tram system upgrades .	DOI, Yarra Trams, other	ongoing
	27 Implement a new tram platform program specifically designed to maximise the number of level access stops constructed at relatively low-impact and/or high-use locations with particular emphasis on routes with low floor trams already operating (eg Collins Street, St Kilda Road).	DOI, Yarra trams, VicRoads, Councils	Mid 2006 onwards
	28 Implement a program to prioritise seating and allocated spaces at waiting shelters.	Yarra Trams	2007
	29 Develop a program of kerb ramp installations at kerb-side tram stops where on-vehicle boarding devices become available.	DOI/ Yarra Trams, VicRoads, Councils	2007 ongoing
	30 Establish suitable TGSI treatments for typical stop types (especially kerb side stops) and a program of implementation.	DOI, Yarra Trams, VicRoads, Councils	2007 ongoing
	31 Continue the program of PIDs and timetable information on tram stops.	DOI, Yarra trams	ongoing
	32 Continue to replace trams as they reach their design life (30 to 35 years) and require all new trams to be low floor and compatible with emerging level access stop standards.	DOI	Ongoing
	33 Undertake further investigation of fitting lifts into new trams including any modifications required to the road infrastructure or road rules under VicRoads "Driving with Trams" program.	DOI, VicRoads	Mid 2006

Area	Action	Responsibility	Timing
	34 Develop further solutions for reducing the horizontal and vertical gaps between platforms and low floor trams. Consider options including a fixed engineering device not requiring driver intervention. Adopt standards for all low floor trams.	DOI, Yarra Trams	Mid 2006
	35 Continue to operate only a limited number of W Class heritage trams.	DOI	Ongoing
	36 Continue upgrading stairs on existing trams.	DOI, Yarra Trams	Mid 2006
	37 Complete the lighting review of existing trams and develop any necessary upgrade program.	Yarra Trams	2007
	38 Continue providing visual information to augment audible announcements by tram drivers.	Yarra Trams	2007
Melbourne and regional buses	39 Develop an operational guide for distribution to all parties associated with the operation of buses or the infrastructure in and around bus stops to clarify responsibility and obligations associated with the DSAPT.	DOI, VicRoads, Councils	Mid 2006
	40 Initiate a program of TGSI installation, access paths and surface upgrades at Melbourne and regional bus stops to meet 2007 and 2012 milestones for infrastructure.	DOI, VicRoads, Councils	Mid 2006 to 2012
	41 Continue the Bus Replacement Program of replacing Victoria's scheduled route buses with low floor buses beyond 2007.	DOI, Bus operators	Ongoing
Regional trains and coaches	42 Develop a detailed implementation program to meet the 2007 and 2012 milestones at V/Line stations, and including upgrading some stations to full DDA compliance at the same time as significant station refurbishment works proceed.	DOI, V/Line Passenger	Ongoing
	43 Develop a prioritised implementation program to upgrade pedestrian rail level crossings at regional stations to the new Standards.	DOI, Victrack,PN, ARTC	ongoing
	44 Continue the program of replacement and/or upgrading of V/Line Passenger trains and including upgrading Locomotive-hauled N-Set carriages to provide full access for people using wheelchairs and mobility aids.	DOI, V/Line	2006 - 2010
	45 Continue the Coach Replacement Program and installation of wheelchair hoists to maintain progress in line with the DSAPT milestone requirements of 55% compliance for 2012.	DOI	ongoing
Taxis	46 Continue the Multi Purpose Taxi Program.	DOI, VTDD, operators	ongoing
	47 Continue to monitor and improve response times for WAT.	DOI, VTDD, operators	ongoing
	48 Liaise with the taxi industry and refer taxi issues to the Five Year Review	DOI, VTDD, operators	2007

Appendix 5

Ministerial Advisory Committee Public Transport Access Committee (PTAC) Membership List Chair - Director of Public Transport, DOI

Name	Organisation
Mr Noel SMITH	Arthritis Victoria
Ms Jessica ZAMMIT	Blind Citizens Australia (BCA)
Mr Patrick MOORE	Council of the Ageing (COTA)
Ms Rina SHERRY	Department of Human Services (DHS)
Mr Danny O'NEILL	Victorian Disability Advisory Council (VDAC)
Mr Frank HALL-BENTICK	Individual
Ms Nicola WOOD	Municipal Association of Victoria
Ms Janice FLORENCE	ParaQuad Victoria
Mr Jeff JACKSON	Returned Services League Australia (RSL)
Mr Shane KELLY	SCOPE
Ms Jesse FRITZE	VCOSS
Mr Maurice GLEESON	Vision Australia - Blindness & Low Vision Service
Ms Jeanette LEE	YOORALLA
Operators	
Mr Wayne MOUNTJOY	Bus Association Victoria
Ms Joanna WHALLEY	Connex Melbourne Pty Ltd
Ms Gina CICCONE	V/Line Passenger
Mr Phil PURDY	Yarra Trams
Mr Grant COOPER	Metlink
Ms Suzanne STEPHENSON	Transport Ticketing Authority
Mr Andrew DIXON	Victorian Taxi Directorate
Mr Brad WILSON	VicTrack
PTD, DOI	
Mr Jim BETTS	Director of Public Transport (Chair)
Ms Kerry LEWIS	Adviser, Minister's Office
Mr Hector McKENZIE	Deputy Director of Public Transport
Ms Andrea MACDONALD	Manager Accessibility (Executive Officer for Committee)
Mr Emilio SAVLE	Senior Policy Adviser, Accessibility Unit
Ms Lisa FROST	Project Officer, Accessibility Unit

Appendix 6

ISSUES PAPER by Allen Consulting Group

KEY ISSUES

Answers to the 28 questions

4.1 ACHIEVEMENT OF PUBLIC TRANSPORT ACCESSIBILITY

Q1. Has accessibility improved since DSAPT (2002)? How?

To conveyances:

To information:

To infrastructure:

- Passing of the DSAPT in 2002 has caused wider focus on DDA obligations and responsibilities and improved progress towards achieving the DSAPT requirements in accordance with the milestones.
- Victoria has made good progress to date. It has a supportive state government, a prosperous economy, public transport is undergoing substantial renewal with dynamic leadership, significant funding, expansion of services, recent new trains, new trams, a low floor bus replacement program, and a legacy of ramp access to train stations. Recently there has been significant increase in patronage due to environmental pressures, congestion, the cost of petrol and other factors including recognition of the benefits of public transport.

Access to conveyances:

Train	96%
Tram	New low floor trams 21%
Bus	50% metro + 40% regional low floor buses
taxi	368 WAT taxis

Access to information:

Maps	Route maps on new trains, trams
Timetables	Metlink one stop shop 131 638, Journey Planner, web info. Alternative formats, big print on stations, new timetables on 1/3 bus stops, tram stops, real time information on stations, tram stops, audio advice of next three services on suburban stations, Smart Bus.
Announcements	Auto announcements on trains, trams, buses, Smart Buses, stations,
Other	Sms, timetables

Access to infrastructure:

Stations	nearly 25% full compliance at stations with higher levels for many parts of the Standards
Tram stops	185 platform tram stops
Bus stops	Program progressing bus stop upgrades towards 25 % compliance
Other – toilets, waiting areas, food and drink	As above

- **Trams**
- Identifying access to trams for people using wheelchairs has been complex and the preferred option is low floor trams with level access from platform tram stops. Consultation with local councils, VicRoads and stakeholders about new platform tram stops can be controversial and time consuming, but wider recognition of their benefits for safer faster boarding and travel time savings for all passengers is now emerging. Considerable work is being undertaken on how to safely deploy automatic wheelchair lifts in the centre of the road for the next tranche of new trams.
- **Pedestrian rail level crossings**
- New standards have been developed with features to improve access for people with disabilities including flatter, more even track crossings, tactile ground surface indicators (tgsis) along the edges and at track entries, wider access paths, and improved signage and information. The flange gap tolerances have been improved through rubber panel technology and improved maintenance practices, and an annual upgrade program continues throughout the state.
- **Operators**
- All operators are required to comply with the DSAPT requirements and develop Action Plans, provide customer service and staff training, and regularly report to PTD on compliance plans and achievements.
- **Expenditure**
- Implementation progress has not been achieved without significant expenditure. Unit costs for key public transport costs include:
 - New Trains – over \$20.0m for a six car electric train, over \$7.0m for a two car regional train
 - Trams – over \$4.0m for a 20 or 30 metre low floor tram
 - Buses – Bus Replacement Program, over \$400,000 for a new low floor bus
 - Stations - \$20.0m program over 5 years, further programs pending
 - Tram stops - \$135,000 - \$500,000 per platform tram stop.
 - Bus stops – varies \$2,000 - \$5,000 per stop
 - Pedestrian Rail level Crossings – strail track crossings \$100,000, Passive upgrade \$135,000, Active upgrade \$400,000 metro, and \$350,000 regional
- MOTC funding of \$10.5b for public transport services across the state over 10 years includes \$250.0m to implement accessibility programs to meet the 2006 milestone and progress towards the 2012 milestone.
- Also included is funding (some \$5.6b) for new trains, trams buses and major infrastructure projects which supplement compliance outcomes.

Supplementary Victorian Programs

- Multi purpose taxis program (MPTP) - \$40m pa in subsidies to users (50% of trip up to maximum \$60) and lifting fee to driver/depot
- Additional resource costs - staffing, in PTD, all operators
- Companion Card Scheme – registered users with a valid ticket may travel on public transport accompanied by their carer travelling free
- Concession fares – for a range of criteria
- Free travel (various categories)
- Travellers Aid Society (TADAS) assists individual travellers

Regional access

- Access workers in regional and rural areas indicate the DDA DSAPT have had lower impact where services are fewer.
- They consider the exempt status of school buses and community transport services removes opportunities for new low floor vehicles to be introduced and precludes children with disabilities from enjoying integrated lifestyles.
- They note that taxi services are more expensive due to distances, and out of zone surcharges are applied.

Q2. Have changes matched expectations of implementation?

- Comments from PTAC members indicate that expectations may be higher than what has been achieved and that more should be provided than mere compliance with minimum standards. Users also expressed concern about apparent lack of coordination between conveyances and infrastructure resulting from the separate application of standards to each infrastructure type (for example a new low floor tram is accessible but the stop is not and vice versa, some buses are accessible but time table does not identify which ones).
- Some compliant systems are in place but are not working satisfactorily (for example drivers do not always provide appropriate assistance, or information is confusing or not available).

Have changes matched requirements?

- Compliance with the 2007 milestones has largely been achieved in Victoria. Refer Compliance Matrix in Appendix 3. Where a compliance level has not yet been met a Program has been established and funded with the aim of achieving progress towards the milestone as quickly as possible, or 'as far as possible' in the terms of the legislation.
 - Stations – Some issues with lighting and food and drink services are still being resolved.
 - Trams - many parts for trams are met at much higher levels than required by 2007 but access to trams for people using wheelchairs is complex and replacement of vehicles before their economic life has been reached is problematic.
 - Tram stops – many parts for tram stops are met at much higher levels than required by 2007 and several programs are in place to build platform stops as quickly as possible.
 - Bus stops – programs in partnership with local government are being established progressively with funding agreements for implementation of tgsi's and paving. Further programs are established including SmartBus, modal interchange, and major projects, which will deliver additional compliance at bus stops.

- PTD has undertaken a considerable amount of work to identify the requirements in public transport operations terms, seek public funding and implement works to achieve its current position. This has included a broad education process for all stakeholders to develop teamwork and cooperation.

Have changes matched your expectations?

If fallen short, please provide examples?

PTAC members commented that:

- better customer service is desirable from people providing direct assistance;
- more staff disability awareness training would be beneficial, particularly for those dealing with the public, as an ongoing process with refresher courses every five years;
- the whole journey is not accessible, with inconsistencies and disconnected sections, varying with the mode, so intermodal interchange can be difficult;
- tram boarding for wheelchair users is limited;
- better coordination of trams and stops is required;
- accessible tram stops at major hospitals and major public services are needed;
- having every second tram accessible would be desirable;
- the interface between vehicles and infrastructure is problematic. The gap at train platforms is a significant issue, and DSAPT gap requirements of 40mm X 12 mm cannot be met;
- DSAPT do not detail requirements for handrails at train doors;
- driver assistance is needed for older people, and those using walkers and canes;
- train ramps should be wider than 800mm with a higher lip;
- signage is not always where it is needed, such as route information on the sides of trams and buses;
- DSAPT do not cover barriers and card sensors or flange gaps at pedestrian level crossings;
- WAT response times still have problems;
- interstate consistency is required.

Q3. Is level of compliance at 5 years sufficient to have had an impact?

- It is considered that the level of compliance at 5 years is sufficient to have had an impact.

Q4. Is current data reliable? Examples of problems

- Current data is reasonably reliable but is difficult to obtain in some jurisdictions. It is a huge task to obtain and update data across thousands of assets throughout the state under different jurisdictions.
- Victoria has found the matrix format very useable for all parties involved as both a working tool and a reporting one. It provides a clear picture of current compliance and emerging problems for resolution.

Q5. How could reporting be improved?

- Reporting could be improved by developing guidelines to ensure consistency in interpretation of the requirements, and their application and reporting between modes and across modes.
- Commonwealth funding could support auditing and data collection.
- Patronage could be reflected in the reporting of compliance as well as the number of assets. This would demonstrate that achieved levels of access are providing much higher benefits than may be apparent.

Q6. Has improved access led to increased patronage?

- Anecdotally improved access has led to increased patronage by people with disabilities. Statistics are not generally kept and some disabilities are not immediately apparent. The use of trains by people using wheelchairs continues to increase, with a number of delays to metro train services now reported as relating to the driver assisting loading people using wheelchairs. Complaints are also raised that there are too many people using wheelchairs seeking to board the same train, and in peak services, and in conflict with passengers with bicycles, prams and other wheeled vehicles.
- There is little feedback on the level of bus use by people using wheelchairs.
- In Victoria all modes of public transport have been experiencing massive increases in patronage for various reasons.
- There is anecdotal evidence that improved access to public transport services has also increased patronage from people with prams, luggage and bicycles.

4.2 CLARIFICATION OF PASSENGER RIGHTS AND OPERATOR OBLIGATIONS

Q7. Has the introduction of DSAPT helped you better understand your rights? How?

- Victoria has undertaken extensive consultation with people with disabilities and operators on the scope of the requirements of the DSAPT, as well as other agencies including operators, VicRoads, local government and industry.
- Regular consultation with the PTAC reinforces understanding via peak disability groups and the wider disability community in Victoria.
- The DSAPT are based on the assumption that people with disabilities using public transport are able to manage the system independently. The standards are based on the 80th percentile of people with disabilities and their requirements. This is not always appreciated by users or advocates.
- In Victoria people with disabilities who require the company of a carer to travel can register with the DHS Companion Card system and take their carer on public transport free. All public transport operators in Victoria recognise the Companion Card Scheme.

PTAC members commented that:

- 'DSAPT has clarified how I could expect my rights to be fulfilled';
- 'Not really as access to the Australian Standards documents is low and costly';
- DSAPT do clarify the process and timelines albeit long.

Q8. Are DSAPT and Guidelines sufficient information on your rights?

Other? If so what?

- The DSAPT are generally considered to be too complicated for people to determine what is required. A reference trail must be followed through several documents (DSAPT, Guidelines, Australian Standards version/s, Clauses and Notes) then applied to the relevant aspect of the public transport service. The DSAPT should be rewritten to define clearly in one document what is required.

PTAC members commented that DSAPT:

- assist people understand what should be available;
- highlight features such as tgsi's;
- identify obligations on operators more than rights of users.

Q9. Are others unaware? How could this be addressed?

PTAC commented that:

- The public are not particularly aware of what it is all about (for example the purpose of tgsi's);
- Not all people with disabilities are members of organisations so they get less information.

Questions for Transport operators and providers

Q10. Has DSAPT clarified your obligations? How?

- Transport operators and providers are generally aware of their obligations although constant vigilance is required and there are always new people entering the field. DSAPT can be very cumbersome and both DSAPT and AS are subject to interpretation when applied on the ground. There is a need to translate DSAPT into public transport operational requirements, modal standards and technical systems, and project procurement, delivery and management processes.
- There are no legal precedents.
- The DSAPT does not address responsibilities and jurisdictions for DDA compliance, which can be complex and difficult to coordinate for outcomes at a project level.

Q11. Are DSAPT sufficient? Other sources?

- The DSAPT are generally not sufficient for implementation. Knowledge is also required of public transport systems and operations and the technical application of the standards to the design and construction industry and vehicle design development and delivery processes.

PTAC commented that:

- Guidelines and brochures are needed on interpretation and translation to the technical regimes of public transport
- the DDA is still required
- The Australian Standards are out of date, slow to be amended and updated, based on minimum provision, not always applicable, not readily available and expensive.

Other Sources

- Some industries apply Codes of Practice and Co- Regulation and most tend to define 'performance based outcomes' rather than prescriptive requirements.
- Retrospectivity is not generally applied in the building industry.
- Guidance is necessary to manage the vast amount of detail across thousands of assets managed by numbers of people under different jurisdictions and responsibilities.
- Overseas experience is regularly drawn upon, particularly in relation to tram networks. German and European standards in relation to gaps between vehicles and platforms are relevant to what can be achieved on train and tram systems elsewhere. These differ from the standards adopted in the DSAPT, which are derived from building applications rather than applications involving moving vehicles.

Q12. Are you aware of other providers who are unaware? How could this be addressed?

- Victoria has regular consultation with operators and industry organisations to clarify responsibilities.

- Information is widely available on web sites, in contracts, in business plans, and action plans.

Q13. Are there areas of DSAPT unclear? Which?

- Significant areas of the DSAPT are unclear, particularly where standards are set by reference to specific Australian Standards which may themselves have evolved. This makes compliance difficult. Victoria has developed guidelines to clarify DSAPT requirements on a modal basis for vehicles and infrastructure – for stations, tram stops, bus-stops, trains, trams and buses – as the industry tends to operate under these divisions. The DSAPT do not recognise that many components are moving, including the users, and even signage must be viewed in an instant.
- Unclear Parts include;
 - Access paths
 - Manoeuvring
 - Ramps
 - Boarding
 - Surfaces
 - Handrails
 - Signs
 - Tgsi's
 - Alarms
 - Lighting
 - Payment of fares
 - Hearing augmentation
 - Information.

PTAC commented that:

- Translation of requirements to each mode operationally is required
- Information, time tables, and application of the requirements to tram services are all unclear.

Referenced Australian Standards too cumbersome to use

- The system of reference-based prescriptive requirements is very cumbersome, making usage and application of the DSAPT extremely complex for providers, operators and passengers alike. It could be simplified without reducing obligations imposed on operators.

Anomalies and inconsistencies

- DSAPT contain a number of anomalies and inconsistencies and inadequate detail which make compliance confusing, difficult, unclear or impossible. Detail is absent in some requirements.
- Signage is unclear. Australian Standards cut out at certain critical levels.
- There are a number of minor anomalies which should be clarified.
- Standard 3.1 specifies the manoeuvring area for a 180 degree turn, but there is no mention of the manoeuvring area for a 90 degree turn. Understanding this turning envelope is important in defining the width of a bus stop with an 800mm ramp deployed. The width needs to be adequate for a wheelchair to go down the ramp and then turn left or right clear of the ramp.
- VicRoads advised conflict and lack of clarity in the DSAPT Lighting requirements applied in the road environment. Standard 20.1 on lighting refers to indoor lighting standards. If these standards were applied to outdoor environments such as bus and tram stops, the high level of lighting would cause road safety and amenity issues. Particularly at centre of road

tram stops, such high lighting levels would be a distraction for motorists. At bus stops and kerbside tram stops the potential for high lighting levels to inappropriately spill into private premises is high. The review of the DSAPT should remove reference to the indoor lighting standard for outdoor environments. Some guidance on appropriate lighting standards in the outdoor environment is advisable. VicRoads is planning to work on lighting standards for bus and tram stops soon as there are implications for the lighting of roads generally.

Q14. Have Exemptions reduced the clarity of obligations?

- The ARA exemption has recognised a number of anomalies in the DSAPT relevant to heavy rail.
- The exemption application process in relation to extending existing school bus services to new town route services clarified obligations to the benefit of many in regional areas.
- The exemption applications in relation to tourist bus services extending into route services have also proved beneficial.
- Exemptions are only temporary and so are regarded as of little value to providers and operators where there is serious difficulty complying with the underlying standard (e.g. safety conflict relating to flange gaps at pedestrian rail level crossings).

4.3 FLEXIBILITY OF APPROACH

Q15. Extent of choice offered in compliance?

- The extent of choice for compliance is necessary. Options are provided but the process is complex and confusing to many, and subject to debate and dispute. Options include:
 - Equivalent access
 - Direct assistance
 - Alternative access
 - Unjustifiable hardship
- Direct assistance is applied where staff are available including VLine Passenger conductors on regional trains and at regional stations, bus drivers, metro station staff and taxi drivers.
- There is no sign off process or 'certification' of compliance or reference body for clarification of requirements. The transport and construction industries prefer certainty before committing considerable time, resources and funding to projects.

PTAC commented that:

- With so many options there can be a lack of consistency and problems with interpretation. Options are necessary as too much prescription could eliminate potential access solutions.

Q16. Are AS technical requirements appropriate? Examples where not appropriate?

- The technical requirements are appropriate in many ways but not in others. It is not appropriate to apply building standards for static construction works to external works and moving parts where rather different tolerances apply. There are problems with the Australian Standards as written.
- There is lack of clarity – what is required for compliance at a typical bus stop? How many allocated spaces should be provided?

- The DSAPT adopt a one size fits all approach, with no hierarchy, and no reflection of patronage.
- The later milestones will become even more difficult and expensive to implement.

Q17. Are there impractical or impossible to implement standards? Specify?

Several parts have requirements which are impractical or impossible to implement:

- Flange gaps cannot be eliminated in access paths across pedestrian rail level crossings.
- Gap limits of 40 mm X 12 mm between trains and trams and platforms may not be able to be met due to loading and safety tolerances associated with the kinematic envelope of moving vehicles. (although Victoria is researching options to improve compliance)
- Hearing augmentation in external environments is technically difficult and hearing loops do not operate effectively. Visual information is preferred as an alternative.
- Cross fall of 1 in 40 is too stringent a requirement in the external environment for train platforms, bus-stops, and tram stops.
- Raised identity numbers on the exterior of taxis is not safe.
- Uneven milestones for roll out of replacement conveyances (trams) are an issue. The milestones require 15 years to provide for 90% compliance then another 15 years to provide for the last 10 % compliance. This could be regarded as an error in the drafting, as a steady replacement rate of 30 years is closer to the norm for replacement of trains and trams although even then changes in the replacement rates over the past 30 years will affect the rate at which vehicles become life expired. Replacing vehicles is expensive and although people with disabilities would prefer the steeper roll out program, funding a program to replace vehicles not yet life expired is not consistent with the principles that underpinned the development of the standards in the first place.
- Further the relationship between conveyances and infrastructure is significant for new public transport and the mis-match of 10 years from 2022 to 2032 could be problematic for coordination of new tram services.

Q18. As users, are there areas where a more specific requirement would improve accessibility?

Users indicate that improved customer service and information would greatly assist accessibility, and that access across a whole journey is what they need but the standards do not address whole of journey issues.

PTAC identified areas for improvement including:

- Better definition of responsibilities
- More performance based outcomes
- More details for assisted access
- Requirements for more staff training and disability awareness training
- Recognition of new technological solutions eg sms timetables, email, web, real time information
- Scooters as mobility aids
- Restraints and tie downs
- Stickers and brochures about 'complying mobility aids'
- Emergency systems
- More information on way-finding

4.4 CONSISTENCY OF APPROACH

Q19. Have requirements been applied consistently across all modes?

Q20. Will areas of inconsistency be addressed through future stages?

- Victoria seeks to achieve consistency across all modes now and in future programs.
- The layout and extent of tgsi installation can be variable, particularly at bus-stops as a result of the large numbers of people and complex jurisdictions and approvals involved. Some were installed before the DSAPT were passed, and opinions on the level of provision differ.
- Ongoing consistency over time is also an issue for any revisions to referenced Australian Standards.

Q21. Are current exemptions appropriate? Should they be reduced over time?

- The Exemption timeframes of 3 – 5 years are too short for the planning and development of public transport infrastructure funded by state governments.
- Implementation of infrastructure projects once approved and funded may still take 2 – 6 years depending on scope and location. Acquisition of new conveyances may take several years in development and approval then several more in tendering, construction, delivery, testing and commissioning.
- Exemptions do not provide any certainty for long term planning and there is no certainty provided for manufacturers and providers. Effectively exemptions involve a minor delay unless renewed consecutively.
- The current ARA exemption for the heavy rail system for up to three years or less is also conditional on the outcome of the Five Year Review. It addresses a number of fundamental anomalies on the rail system, including the flange gap at pedestrian rail level crossings, and the impact of the large toilet cubicle required for regional trains on aisles and seating, particularly on narrow gauge trains.

Q22. In implementation have DSAPT requirements led to a relatively consistent standard of compliance across all modes?

- Victoria seeks to implement the DSAPT consistently across all modes however there are modal differences in the nature of access, and higher levels of access have been achieved in train, bus and taxi than tram services. Further there are differences between conveyances, premises and infrastructure for the same mode depending on patronage and metropolitan or regional location. Where costs are low higher levels of access and compliance are achieved.
- **System wide initiatives**
- Some requirements are met by systems applied across all locations, eg handrails, tgsi's at various stations, Metlink signage and information for metro tram and bus stops, and train stations.

If not where are the major differences?

- **Information**
- The level of information provided varies between modes and location reflecting patronage, complexity and technology.
- **TGSI's**
- Installation of tgsi's is generally consistent for hazard tiles but less so for directionals and opinion varies between stakeholders on layout and minimum

provision.

- **Conveyances**
- Access provision varies between train, tram, and bus and taxi modes but within a mode is generally the same.
- Trains rely on a manual ramp being deployed but have almost full compliance. Current retrofitting of regional N Set carriages should improve access to regional trains and remove the need for passengers using larger wheelchairs to travel in the conductor's compartment.
- Buses at 50% compliance rely on a fixed manual ramp deployed by the driver and there is less pressure on infrastructure to achieve access.
- Achieving access to trams for people using wheelchairs is difficult and the preferred solution is level access to a low floor tram from a platform stop. This is being implemented as far as possible but relies on replacing the whole tram fleet and building platform stops where usage and space permits. Approvals for the construction of new platform stops are complex and consultation with the many stakeholders can be controversial and time consuming. The feasibility of installing lifts on new low floor trams is also under investigation.
- Taxi issues relate more to responsiveness, customer service, and the structure of the (private sector) industry than conveyances or infrastructure.

4.5 COMPATIBILITY OF APPROACH

Q23. To what extent do the DSAPT address all people with disability accessibility requirements? Are there gaps?

- DSAPT do not include provision for people with multiple disabilities, such as people who are deaf and blind. People with multiple disabilities have more compounded difficulties using public transport.
- Victoria has introduced a Companion Card where a person requiring the constant assistance of a carer can take their carer with them on public transport free.
- Provision for people with mobility impairment (but not wheelchair users) or using walkers have difficulties boarding and alighting conveyances but the provisions do not cater well for them.
- Scooters are being more widely used (non medically prescribed) and their reduced turning circles and larger size than specified in the Standards can cause issues in taxis, on buses, and on access paths.
- The DSAPT do not particularly address customer service standards and disability awareness training.
- The DSAPT do not address Smart cards and other technological innovations.
- The requirements for hearing augmentation do not consider that people with hearing impairment prefer visual information as their alternative format.

Q24. Do milestones provide for gradual improvement over the 30 year implementation period? Are there compatibility problems? How could these requirements be improved?

- Many passengers regard the timeframes as too long, and many operators regard them as too short.
- Some areas need more time to develop good access solutions, such as trams.

Compatibility Problems

- Compatibility issues vary between modes.
- On tram services it is difficult to align platform stops with low floor trams, partly due to the limited supply of both, partly due to the road conditions

having limited space to install platforms, and partly due to the need to accommodate patronage demand for mass transport.

- There is a significant mis-match between the milestones for trains and trams (30 years) and related infrastructure (20 years), which may prove unworkable, particularly for tram services. This should be reviewed, as the interface between the vehicle and the platform is particularly problematic and the DSAPT gap minimum of 40mm X 12 mm is difficult to achieve.
- The milestones present a very strict replacement rate for trains and trams providing 15 years to replace 90% of vehicles and another 15 years to replace the last 10% of vehicles, which does not fit comfortably with vehicle replacement programs or cycles.

Suggested Improvements

- A more even roll out of vehicles across the 30 years should be considered, whilst achieving the same final result of full compliance by 2032.
- The compliance milestones for tram infrastructure could be amended to 30 years, to be consistent with the milestones for tram vehicles.

Q25. Are providers meeting their obligations across all aspects of accessibility?

- In Victoria providers and operators are seeking to meet their obligations across all aspects of accessibility. Good progress is being made in Victoria but there are some inherent difficulties. They include providing wheelchair access to trams and response times for some wheelchair accessible taxi services. Generally programs are in place to make the best possible progress.
- Over recent years there have been significant increases in the experience and skills of people employed by operators and providers to address accessibility on public transport.
- There have been high levels of consultation with PTAC on strategic issues and on specific projects. New technology offers new unexpected solutions in many situations.
- There is more work to do in relation to people's attitudes and behaviours in relation to people with disabilities. There is clearly more work required to improve customer service and disability awareness training.

Q26. Do DSAPT need to more explicitly recognise other regulatory constraints that impede implementation?

- There are conflicts between the DSAPT and other legislation and operational practice, such as OH&S, safety generally, transport and heritage legislation and efficient use by all passengers.
- Providing direct assistance may require assisting people using wheelchairs up or down ramps, or lifting mobility aids into buses or taxis, and such activities require training and insurance for staff.
- The DSAPT provide for assisted boarding on 1 in 4 manual ramps, but this scenario is neither safe nor practical.
- The Building Code of Australia provides for landings every nine metres (not six) on ramps of 1 in 14 and certifiable under a building permit. This is the preferred standard as otherwise the ramps become too long to use.
- Access and safety issues can conflict in relation to restraints for mobility aids, particularly on buses, and raised identity numbers on the outside doors of taxis.
- VicRoads advise a conflict between the DSAPT kerb height and road construction practice. Standard 8.1 specifies the height from the road surface

to the top of the kerb should be 150mm. Kerb construction techniques mean that while the back of kerb height is 150mm, the height of the road surface to the top of kerb is more like 110mm, as the channel for drainage is 40mm lower than the road surface. No issues have been reported achieving the necessary gradients with the effective 110mm drop. This standard should therefore be altered to reflect current kerb design standards. It is suggested that a minimum height between top of kerb and road surface of 100mm be used.

4.6 CERTAINTY OF PROCESS

Q27. How well is the complaints process understood by the public?

- The HREOC Complaints process is not well understood and becomes confused with other complaints processes. These include operator customer feedback systems, the Victorian Public Transport Ombudsman who deals with referred complaints not satisfactorily resolved by operators, and complaints under Victorian Equal Opportunity and Human Rights legislation.
- HREOC Complaints processes are costly and time-consuming for all parties involved. It is a substantial task for providers and operators to communicate all the data and issues associated with a complaint and there can be duplication between operators and agencies. Litigation is widely regarded as an unfortunate diversion of scarce funding for accessible public transport to the legal system although court appeals have been relatively rare.

Information on DSAPT

Q28. Are current processes sufficiently responsive to complaints or requests for information on the DSAPT?

- HREOC has provided some valuable discussion information on its web site.
- Victorian DOI access information is widely available, with Metlink providing a 'one stop shop' for public transport information for all passengers, and DOI and operators providing information via telephone, web sites, sms, media, publications, radio, audio and reports and in accessible formats.
- Victoria has released its full compliance across all Parts of the DSAPT, for conveyances, premises and infrastructure and for all milestones.

Appendix 7

Victorian Taxi Directorate – Taxis and WAT's

1.0 Industry

The State Government regulates the industry by issuing licences to provide services but has limited 'power to direct' how private companies run their business and what information they provide. This is a significant difference from the public transport services of train, tram and bus operated primarily by companies under contract to the Director of Public Transport on behalf of the Victorian Government.

Statistics

Victoria has 4547 taxis and 368 of these are wheelchair accessible

Area	Conventional taxis	Wheelchair accessible taxis	total
Metropolitan taxi zone	3439	234	3673
Country (includes Outer-suburban taxi zone)	537	103	640
Urban (Ballarat, Bendigo & Geelong)	203	31	234

The Conditions of License are primarily consistent for all taxis within local taxi service areas. WAT Licenses have additional Conditions in relation to the specific vehicle and associated equipment requirements, and place an obligation on the driver to give priority to wheelchair bookings.

Taxis are part of the public transport system, but unlike other modes of public transport, the taxi industry, including booking dispatch networks, is operated by the private sector without Government funding.

The economic viability of the industry is marginal for some areas particularly regional Victoria where some services have gone out of business. Economic viability for drivers is also marginal and many flow in and out of the industry as other employment options wax and wane. Many are itinerant and part-time workers including students. Services levels for all taxi users can be variable and can be adversely impacted by peak periods, festivals and events, and bad weather.

The progressive implementation of a taxi industry accreditation scheme from January 2008 will clarify roles within the industry. The accreditation process aims to enhance the industry's reputation by taking the best of what industry is doing now to serve its customers and ensure a minimum service standard. This follows on from the recent Driver accreditation and will mean that licence holders, operators and network service providers will be accredited and required to meet minimum standards. This will help the industry to deliver consistent customer service and improve its credibility within the community, particularly in the metropolitan area. Accreditation standards will assist the taxi industry to ensure all participants are committed to providing a professional, quality service and will result in accurate and reliable information to support proper planning and service delivery

2.0 Multi Purpose Taxi Program (MPTP)

The MPTP subsidises the cost of taxi travel for people with severe and permanent disabilities who are unable to independently access public transport. The State subsidises registered users for 50% of the taxi fare up to \$30 maximum per trip and an annual cap of \$1030 for some users. This can be raised on a merit based application.

During 2006/07 the MPTP subsidised 4,554,956 taxi trips (all members) including 564,000 trips by people in wheelchairs, of which 454,000 members were carried in wheelchair accessible taxis. PTD has undertaken extensive liaison with the VTA to clarify operator obligations under the DDA DSAPT.

Lifting Fee in Victoria

For trips made under the MPTP by people using wheelchairs, the State also pays an additional amount (known as a Lifting Fee) of \$10 per wheelchair carried in a wheelchair accessible taxi and \$5 per wheelchair carried in a conventional taxi (rural areas only). Taxi licence conditions require that at least \$6.70 of the \$10 is retained by the driver of the wheelchair accessible taxi, the balance accruing either to the driver or the taxi operator. The taximeter must not be turned on until the passenger is secured in the vehicle and the vehicle is ready to depart and must be stopped prior to disembarking the wheelchair passenger. This ensures the fare paid for a trip is the same as for other passengers. In other states where there is no lifting fee, typically the taximeter is turned on during the loading and unloading process, resulting in the passenger incurring this additional cost.

3.0 WAT Bookings and Response Times

Some 70% of metropolitan WAT bookings are engaged directly between user and driver and those arrangements, including response times, may therefore be assumed to be satisfactory. The remaining 30% are done through networks and some of these bookings can have problems with response times. The extent is unknown as the data is unavailable – this is currently regarded by the industry as private business information, but performance reporting will be a formal requirement of accreditation from 2008. Anecdotal advice is that the network booked service within metropolitan Melbourne is satisfactory in a third of these cases, there are some problems in another third, and the remainder is poor. WAT service delivery throughout regional Victoria is largely regarded as satisfactory. VTD is managing the situation for better outcomes including:

Trial WAT Retention Program

To encourage WAT drivers to do more wheelchair work in areas identified to be under-served, the state has trialled an arrangement where it pays a retainer per day as an educative mechanism so drivers are geographically placed and, in turn, are able to develop their business at a commercial level where it becomes profitable to concentrate on WAT services.

WAT Register

The VTD with DHS is considering a register of drivers by geographic areas so people can make bookings direct with them and drivers can nominate a preferred area to focus their services e.g. eastern metro suburbs.

Airport Survey

VTD is undertaking an airport passenger survey to identify the level of wheelchair passenger service required to balance demand with WAT supply, thus eliminating an over-concentration of WATs where they may not be needed.

Training

The course in taxi driving (metropolitan taxi drivers) includes a 10 hour customer service unit covering people with special needs including people with disabilities. WAT drivers state-wide undergo 40 hours compulsory training and all should be trained by November 2007. The state is fully funding the provision of WAT driver training.

Wheelchair Accessible Taxi Response Time Survey

PTD/VTD is undertaking a survey of drivers and passengers to establish wait times and confirm the geographic areas of service concerns. Data are currently being collated. Depots are indicating they will provide more information.

Subsidy for Procurement of WATs in regional locations

Following a regional taxi review the state has instigated a program to provide more WATs on the road in regional locations. A tied grant can be obtained to replace or acquire a new wheelchair accessible taxi vehicle at about the same cost as a conventional vehicle.

4.0 Raised ID Numbers on exterior of vehicle

The DSAPT requirement for raised ID numbers on the exterior of vehicles near the door handles is deemed unsafe, and is strongly opposed by people with vision impairment in Victoria.

The issue has been referred by APTNAC to ATIA for advice. The initial response was to seek an Exemption but this was later rejected as it would only provide a temporary delay rather than a solution. An interior location is now being considered by ATIA, similar to overseas e.g. Hong Kong, but there are issues of consistency nationally, from vehicle to vehicle model, and where and how to fix numbers in the back seat. Any option would require VTD approved and would need consistent placement. An externally located solution is being implemented in Queensland at a cost of \$75 - \$90 per taxi.

Victoria is more advanced than elsewhere in that if a passenger requests a receipt at the end of a trip, this is produced electronically and the taxi number and driver ID are both included on it, albeit in print format. Passengers are being encouraged to do this after all trips.

Appendix 8

Comments on each Part of the DSAPT

No	CLAUSE	REVIEW & COMMENT
1	Preliminary	Various anomalies, gaps, issues, AS referencing
2	Access paths	Clarify, flange gap in pedestrian rail level crossings, application issues
3	Manoeuvring areas	Clarify, requirement for 90 turn by people using wheelchairs, issues on conveyances
4	Passing areas	Application issues
5	Resting points	Application issues
6	Ramps	Clarify, 1 in 4 assisted access problems, landings, cross fall 1 in 40, Application issues
7	Waiting areas	Application issues
8	Boarding	Conflict with state kerb standards, gaps 40 X 12 cannot be met , consider overseas standards and tolerances
9	Allocated space	Application issues
10	Surfaces	Clarify, clear requirements not provided
11	Handrails and grab rails	Clarify requirements at doors of trains
12	Doorways and doors	Application issues
13	Lifts	Application issues
14	Stairs	
15	Toilets	Application issues - wc cubicle size on trains
16	Symbols	
17	Signs	Clarify requirements, anomalies, gaps
18	Tactile Ground Surface Indicators	Clarify, application issues, directional tgsi's
19	Alarms	Clarify, visual alarms
20	Lighting	Clarify requirements
21	Controls	Application issues
22	Furniture and fitments	
23	Street furniture	
24	Gateways	
25	Payment of fares	Clarify, vending machines, new technology, smart cards, scanning devices
26	Hearing augmentation – listening systems	Clarify, visual information preferred as alternative access, hearing loops problems
27	Information	Clarify requirements, new technology
28	Booked services	Longer notice may be required
29	Food and drink services	Imported vending machine issues
30	Belongings	Scooter issues
31	Priority	
	Raised taxi ID	Safety issues
	Milestones	Review longer term milestones for coordination