

ACAA Third-Party Documentation Requirements: Survey of Psychiatric-Disability-Mitigating Animal Users

December 11th, 2016

United Service Animal Users, Supporters, and Advocates¹

TO: Blane A. Workie (& Jerome Davis of Econometrica)
Office of the Aviation Enforcement and Proceedings
US Department of Transportation
(202) 366-9342

RE: DOT-OST-2015-0246; DOT's request for information for regulatory impact analysis

Ms. Workie & Mr. Davis:

On December 7th, Jerome Davis of Econometrica requested information from us by December 12th for "a regulatory impact analysis for an eventual proposed rulemaking" by your office. He asked for "any data or other qualitative information on the costs of obtaining or maintaining third-party documentation for service animals and/or emotional support animals".

We clarified via teleconference on December 7th with DOT and Econometrica that DOT is interested in the impact of the current regulations, which allow airlines to require a letter from a medical professional up to 48 hours before flying for those who use an animal to mitigate a psychiatric disability. We are responding to this request publicly (in addition to writing the requesting parties directly), in order to share this information with other interested parties.

In addition to references we provide below, between the nights of December 7th and December 10th we surveyed individuals who identify as having a psychiatric disability and who use an animal to mitigate it. This population includes psychiatric service animal users (which itself includes PTSD service dog users) and emotional support animal ("ESA") users. We advertised the survey via social media and directly to groups devoted to the target audience, and received 56 responses.

This report is organized in six sections as follows.

¹ USAUSA is an informal collaboration of diverse stakeholders.

- §1. *Earlier qualitative sources*
- §2. *Statistical context*
- §3. *Survey content*
- §4. *Survey results overview*
- §5. *Quantitative survey data*
- §6. *Qualitative survey information*

§1. *Earlier qualitative sources*

As referenced in footnote 52 of our recent public comment that 23 parties signed onto,² around October 6th–7th in the Reg Neg docket you can find many qualitative descriptions of the difficulties people with disabilities suffer when forced to obtain third-party medical documentation in order to fly.³ Even more such descriptions can be found in the 2009 petition from Psychiatric Service Dog Society,⁴ referenced in footnote 53 of the same comment.

§2. *Statistical context*

Over 325 million people are in the United States.⁵ The US Census Bureau indicates that in 2010, 56.7 million of these people had a disability (19 percent of the population), with at least 7 million of these related to mental illness.⁶ According to a Substance Abuse and Mental Health Services Administration (SAMHSA) report cited by the National Institute of Mental Health (NIMH), "In 2014, about 1 in 5 adults aged 18 or older (18.1 percent, or 43.6 million adults) had any mental illness (AMI) in the past year, and 4.1 percent (9.8 million adults) had serious mental illness (SMI)."⁷

Based on unofficial self-reports from airlines during the Negotiated Rulemaking ("Reg Neg"), we estimate there are somewhere in the neighborhood of 100,000 flyings each year by psychiatric service animals and emotional support animals (ESAs).

§3. *Survey content*

2 <https://www.regulations.gov/document?D=DOT-OST-2015-0246-0290>

3 <https://www.regulations.gov/docketBrowser?rpp=25&so=DESC&sb=postedDate&po=0&dct=PS&D=DOT-OST-2015-0246>

4 <https://www.regulations.gov/docket?D=DOT-OST-2009-0093>

5 <https://www.census.gov>

6 <https://www.census.gov/newsroom/releases/archives/miscellaneous/cb12-134.html>

7 Note that "serious mental illness" is defined in a way that clearly connects with standard federal definitions of disability. <http://www.samhsa.gov/data/sites/default/files/NSDUH-FRR1-2014/NSDUH-FRR1-2014.htm>

Here we reproduce in text and image exactly what the content of the survey was.

ACAA Medical Letter Survey

This survey is only for those with a psychiatric service dog (including a PTSD service dog) or an emotional support animal (ESA). It's only open until *Saturday, December 10th*, 2016. Thank you so much for your quick input!

In order to fly, the Air Carrier Access Act (ACAA) currently lets airlines require a medical professional's letter for a person with a mental health disability who uses an animal to assist with that disability. The Department of Transportation (DOT) is trying to understand the impact of this requirement to evaluate a possible update to the rules. Your input will seriously help.

1. Do you have a medical professional who you know is willing to write a letter for you to fly with your animal? (If not, you can skip to question 5.)
2. If you were to get a letter to fly, approximately how many *dollars* would it cost to get the letter? In a single number, please include your co-pay, any transportation costs, any lost wages, childcare, or any other associated costs you would not otherwise have.
3. On average, how many *days* does/would it take before you could get in to see a medical professional and then get a letter to fly? (Please do not give a range.)
4. How many *hours* does/would a visit take you to get a letter to fly? In a single number, please include transportation, waiting time, and the medical visit itself.
5. Have any of these issues above caused you not to fly or to fly less than you would otherwise?
6. Please share any other remarks about this that might help DOT understand the costs and burdens you might face because of the ACAA requirements.

[image follows]

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1. Do you have a medical professional who you know is willing to write a letter for you to fly with your animal? (If not, you can skip to question 5.)

- Yes
 No

2. If you were to get a letter to fly, approximately how many *dollars* would it cost to get the letter? In a single number, please include your co-pay, any transportation costs, any lost wages, childcare, or any other associated costs you would not otherwise have.

Your answer _____

3. On average, how many *days* does/would it take before you could get in to see a medical professional and then get a letter to fly? (Please do not give a range.)

Your answer _____

4. How many *hours* does/would a visit take you to get a letter to fly? In a single number, please include transportation, waiting time, and the medical visit itself.

Your answer _____

5. Have any of these issues above caused you not to fly or to fly less than you would otherwise?

- Yes
 No

6. Please share any other remarks about this that might help DOT understand the costs and burdens you might face because of the ACAA requirements.

Your answer _____

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§4. *Survey results overview*

There were responses from 56 individuals, but all questions were optional, so not every responder answered every question. The quantitative summary is bulleted below.

- Over one out of ten people surveyed indicated they do not think they have a medical professional willing to write a letter for them to fly with their animal.
- The average cost to obtain the paperwork is \$156.77.
- It takes an average of 30.6 days to get in to see a medical professional and obtain a letter.
- The average time for a visit to obtain the letter is 4.8 hours.
- Over three out of four people surveyed have either not flown or have flown less because of these factors.

There are significant costs to the economy that are touched on by these numbers. As reported by the Johns Hopkins Bloomberg School of Public Health, our \$156.77 cost is similar to the (\$160) average cost for a new, uninsured patient visit.⁸ However, our numbers do not include the amount any insurance pays, any losses in work productivity for the 4.8 hours the employee might have to take off work, etc.

While a significant portion of those surveyed do not have access to a medical professional willing to enable them to comply with the documentation requirement, there is an even more stunning statistic. Fully three quarters have reduced or eliminated flying as an option because of the current regulations. If we generalize this survey and apply our earlier estimate of around 100,000 annual flyings of psychiatric service animals and ESAs, we might conclude that the regulations have prevented somewhere on the same level of tickets from being purchased. If we take the average fare for 2016 from DOT's Bureau of Transportation Statistics, \$361,⁹ we're looking at a magnitude of loss to the airline industry alone on the order of \$36,100,000.

§5. *Quantitative survey data*

At the request of DOT or Econometrica, we are happy to set up direct

8 <http://www.jhsph.edu/news/news-releases/2015/primary-care-visits-available-to-most-uninsured-but-at-a-high-price.html>

9 http://www.rita.dot.gov/bts/airfares/programs/economics_and_finance/air_travel_price_index/html/AnnualFares.html

access to the raw data separately from this report. In this section, we provide the data under each of the (five) quantitative questions. We note but filter out such responses as non-numerical answers to numerical questions.

1. Do you have a medical professional who you know is willing to write a letter for you to fly with your animal? (If not, you can skip to question 5.)

55 responses
89.1% Yes, 10.9% No

2. If you were to get a letter to fly, approximately how many *dollars* would it cost to get the letter? In a single number, please include your co-pay, any transportation costs, any lost wages, childcare, or any other associated costs you would not otherwise have.

50 responses, 47 amenable
Mean: \$156.77. Median: \$70. Range: \$0–\$1,500.

\$0	\$0	\$0	\$3	\$10	\$15	\$20	\$20
\$20	\$20	\$20	\$25	\$25	\$30	\$45	\$50
\$50	\$50	\$50	\$60	\$60	\$60	\$70	\$70
\$80	\$80	\$100	\$100	\$100	\$115	\$125	\$150
\$150	\$150	\$175	\$175	\$185	\$200	\$200	\$230
\$280	\$300	\$350	\$400	\$450	\$1,000	\$1,500	

Not incorporated:
"I don't know"
"It soesn't mattrer" (sic)
"Unknown but probably an office visit."

3. On average, how many *days* does/would it take before you could get in to see a medical professional and then get a letter to fly? (Please do not give a range.)

49 responses, 48 amenable
Mean: 30.6 days. Median: 16.5 days. Range: 1–180 days.¹⁰

¹⁰ When responses were given in months, 30 days were used per month. When a range was given, the mean was used.

1	2	5	5	7	7	7	7
7	7	9	9	10	10	10	10
14	14	14	14	14	14	14	15
18	21	21	21	21	21	21	28
28	30	30	30	36	45	45	45
60	60	90	90	90	90	120	180

Not incorporated:
"It doesn't matter"

4. How many *hours* does/would a visit take you to get a letter to fly? In a single number, please include transportation, waiting time, and the medical visit itself.

50 responses, 48 amenable
Mean: 4.8 hours. Median: 3 hours. Range: 1–48 hours.

1	2	2	2	2	2	2	2
2	2	2	2	2	2.5	2.5	3
3	3	3	3	3	3	3	3
3	3	3	3	3	3.5	3.5	4
4	4	4	4	4	4	4	4
5	5	5	6	6	12	30	48

Not incorporated:
"a few messages and hopefully only one trip or they might mail it to me...idk"
"It doesn't matter"

5. Have any of these issues above caused you not to fly or to fly less than you would otherwise?

55 responses
76.4% Yes, 23.6% No

§6. Qualitative survey information

This final section contains the information collected from 36 individuals in response to the final, qualitative question in the survey. These comments clarify the great weight of the burdens the current regulations inject in

people's lives that can't be adequately conveyed by the numbers.

6. Please share any other remarks about this that might help DOT understand the costs and burdens you might face because of the ACAA requirements.

1) If I was diabetic or hard of hearing I wouldn't have to worry. But a PTSD dog (especially since I'm not a veteran) is looked at differently. They need to separate service dogs from ESAs. The public believes they are the same thing because the airlines allow everything from lizards, turkeys and pigs to fly. People confuse the terms. I hate it.

2) It's hard to see my doctor because I have no child care. I have my son 24/7 while my husband works. Time is a big factor plus extra costs, all out of pocket. I know that we cannot afford both-a letter & flying costs. It's hard enough to provide top notch care for a service dog without any help, much less wasted time & money for a piece of paper.

3) I have discomfort with having information about my medical condition kept by people not bound by HIPAA and that it is not kept in secure storage.

4) There are just so many judgmental people who want to be doctors. It's tiring to have to explain to everyone I meet what my condition is. I don't feel it's any of their business. I unfortunately face this hurdle in the coming year as some of my medical appointments are in other states. It would be nice if things were simple to understand when requesting travel info. I most often get "I don't know" or "are you blind?" Which is defeating in spirit and productivity.

5) Due to memory problems associated with my disability I may not be able to get the letter and get it in on time.

6) I do not want to share information about my disability with strangers. If I have a seizure disorder or diabetes I don't have to share that my disability is medical and with the stigma on psychiatric disorders having to share that is even harder. It was also a problem finding a therapist who could write the letter and opening up to new people is very difficult. Much of my family lives out of state. I went through the trouble to get the letter but haven't been able to bring myself to use it.

7) Any support letter takes months to build relationship with provider first. Consider building a provider survey around this.

8) I don't fly due to the extra access stuff needed. It triggers my PTSD and anxiety way too much for me just thinking about it. If I knew I wouldn't have any access challenges to fly with my dog I might consider flying. But as it is, I can't do it.

9) I am a nurse practitioner that served at the 9/11/2001 tragedy. In spite of having medical documentation, a highly and professionally trained service dog, I have been grossly mistreated on more than one occasion by Hawaiian Airlines. My disabilities and service at 9/11 have been mocked, I have had to disembark planes twice and have been routinely hassled for insisting on my rights as a disabled flyer. HA retaliated for my reports to DOT by telling me I have to receive special permission each time I fly and that I am forbidden to fly with my service dog. All of this has been videotaped and documented extensively. As a Hawaii state resident, this effectively grounds me unless I take a major carrier, none of which flies interisland. I strongly urge to establish regulations which will actually protect legitimately disabled travelers who need legitimate service dogs, rather than making travel difficult to impossible for them. If anything, the carriers' obligations need to reflect the spirit of the ADA and civil rights, rather than forcing disabled persons to be subject to repressive regulations that able bodied passengers are not. Will we need to climb the DC capital house steps on our hands and knees again to illustrate our right to disabled accessibility again? I remain in your service.

O au me ka ha`a ha`a (I am humbly yours),

Elizabeth Bush, MSN, APRN, CARN-AP, CSAC, CCDP-D
Board Certified Psychiatric Advanced Practice Nurse (NP and CNS)

Certified Addiction Registered Nurse, Advanced Practice
Certified Substance Abuse Counselor
Certified Co-Occurring Disorder Professional-Diplomate

"The best way to find yourself is to lose yourself in the service of others." ~ Mahatma Gandhi

10) My dog is an experienced flyer. Having to make sure I have

a letter ready to present at any moment simply adds to my stress levels. If I had a cane or wheelchair, no one would question my dog's job.

I have to request a full appointment just to have a letter signed. Simply because my disability is invisible. When you factor in childcare, and travel time, it gets quite expensive for a piece of paper. That in all my flights, no one has ever actually asked to see.

11) I have flown once with my PTSD service dog and it was absolutely mortifying to have to hand multiple complete strangers a piece of paper verifying that I had a psychiatric disability to get through the airport and onto that plane. Psychiatric issues carry a lot of stigma and you never know who you're dealing with so it's not something I advertise in public with people I don't know. To have to do that simply because my disability is psychiatric instead of physical, even though I use a task trained service dog with thousands of hours of training just like someone using a guide dog or mobility service dog is discriminatory. Plain and simple. My service dog is NOT an ESA, she is highly trained. A service dog is a service dog no matter the disability they mitigate. I will not fly again unless it is absolutely necessary as the ACAA stands.

Let me paint another scenario for you. It is very likely with my severity of PTSD that I will never function in public alone without a service dog. There will also come a day when I'm not in therapy sessions anymore because there are no more coping skills to learn and no more trauma to process. I will be functioning as best as I can be, but still experience disruptions of my major life activities that a service dog can mitigate. Then I won't have that treatment professional to write me a letter even though my PTSD is still disabling. My primary care physician doesn't understand enough about my PTSD to write that letter. So I'd be placed in a situation where I had to get another therapist, just to write that letter and that could take WEEKS just to get in and then there's no guarantee that that particular therapist would agree to write that letter without seeing me a number of times, so add a few more weeks on top of that. That's a lot of money and time. 10+ hours and and \$1000+ dollars. At that point, why fly in the first place? That's too much of a burden, and I'd just have to drive. If I had to get across the country for a dying family member or friend I'd just have to hope

I could drive there in time because there's just no way of getting on a plane on short notice. I couldn't visit family or friends on whim or take an unplanned weekend getaway. All the while the airlines are losing money that myself and whoever I was traveling with would have been spending to get to a destination all because the ACAA requires letters for task trained psychiatric service animals! Sounds like a lose-lose situation to me.

I truly hope that DOT can reach an agreement with the service dog advocates involved in this process so that the process for admitting a service dog is the same for any type of service dog and that an undue burden is no longer placed on psychiatric service dog handlers. When my dog is so well behaved that the flight attendants didn't even realize my 65 lb German Shepherd was on their 4.5 hour long flight until we walked off the plane (and out of our standard seat I might add) I shouldn't be facing this whole letter requirement just because she does PTSD tasks. I would love for things to change so I can start flying again. Until they do, I'll be driving.

12) Having to go through these steps make me less willing to fly or travel to places where I might need to fly back home.

13) Requiring a doctor's note to be able to fly with our medical device is discriminatory against service dog users. If you are to implement a doctor's note policy for medical equipment, you must extend that requirement to all: service dogs, wheelchairs, oxygen tanks, epi pens, canes, etc. If you find this too cumbersome, perhaps consider getting rid of the elementary policy altogether; instead of singling out service dog users and making us have to jump through extra hoops just to fly, treat us like you treat every other disabled customer. Thank you.

14) In an emergency I would not be able to fly.

15) I guess the biggest problem is the dogs size. An assistance dog medium to large has very little space. Are given a lot of slack for not having a little dog. Discrimination against service dog owners with mobility dogs, or blind assistance dogs.

16) I have to wait for an opening or go and sit for 5-6 hours for a walk in and risk seeing another doctor explaining why I need the note and usually they will tell me to see my doctor since

they were not the one seeing me. My dr is 45-60 min away and uses up to a quarter of a tank of gas round trip. not to mention people with psychiatric disabilities are the only ones required to get a drs note.

17) It identifies my category of disability as mental health where that is protected by HIPPA. So it kinda scapegoated me as a mental case and people have treated me differently because of my psychiatric service dog.

18) I have anxiety attack and my girl helps protect me from harming myself and possibly others near by me so in my situations I need her every day everywhere

19) I'm autistic and that's primarily what my SD mitigates. I don't need regular care from my psychologist so a letter from a mental health professional currently treating me is 1) a bit of a stretch and 2) I would have to do an intake as a new patient if it had been more than 3 months since I was last in. This means insurance approval, wait for an opening, etc. and I have great insurance through my job. If I wasn't fortunate to have a job and a job with great benefits this would easily stop me from flying.

20) Each time I have to ask a doctor for a letter for any purpose, I have to request an appointment SPECIFICALLY for the purpose of the letter and then spend the entire appointment educating him or her about the various laws as well as talking them into writing the letter. Many doctors would prefer not to put their signature on such a letter. If I had to have a doctor's letter to fly and needed to make an emergency trip, the trip wouldn't happen simply due to the added stress, rigamarole and time added by the process of obtaining the needed letter. Fortunately this hasn't happened - yet - but that's by luck with the age of my remaining relatives. And I can't plan in advance for the letter because the ACA requires the letter be written within a certain period of time and planning in advance could easily mean repeatedly writing the letters - at great wastes of time and expense. Basically, a well thought out, well planned and prepared for travel flight is the ONLY way to fly thanks to the letter requirement. That's the only way to have the time to get the necessary letter unless by sheer luck the one on hand is still within the allowed time window.

21) Just the possibility of needing a letter adds stress to an

already stressful activity and doesn't feel fair when no other SD handler is required to furnish a letter from their doctor(s). Disregarding stress and inequality, this also requires PSD handlers to divulge potentially sensitive information to airline staff who may not fully appreciate the need for discretion and privacy.

22) Extra stress! Possible panic attacks.

23) I live 80 miles from town. My Dr is so busy the wait time to get in is 4-6 weeks. With my insurance deductible high (thank you Obama) I have to pay visits like this out of pocket. I would not make a special visit just to get a Dr note and have it updates annually just for flying (the only place it's required). I do have a disability and requiring proof of that is not only demeaning and embarrassing, it's financially a burden.

I'd rather have a behavioral assessment of my dog at security rather than show a ticket agent a letter describing my intimate health details. Really all you want are well behaved dogs, just do a simple test. Any real service dog will pass with flying colors, pets will likely not. Simple.

24) Getting an appointment for the letter is extremely prohibitive, the cost associated with acquiring the letter is extremely prohibitive (the appointment, drive time, gas, cost of the Dr writing the letter, the time to wait for the letter to be created, usually not the same day), the time it takes to actually go down and see the Dr. and ask for a letter, plus having all the information that needs to go into the letter is prohibitive (the letter must be very specific), The fact that I am disabled and don't have the time, energy, money for acquiring a letter is completely unfair.

I am VERY lucky that I have Drs who support my use of a service dog otherwise I just might be out of luck entirely. A lot of Drs think that because they have written a letter of support for a service dog that they are now somehow responsible for that service dog and everything it does. They don't want to put that burden upon themselves should something go wrong so they won't support writing a letter. Also some Drs think that using a service dog is akin to using a 'crutch' and will not support the use of a service dog for a psychiatric illness much less write a letter for one.

I also use a wheelchair and have never been asked for any kind of letter regarding my use of it. I don't need a Drs letter of approval to fly. I don't need a Drs note to purchase a wheelchair if I need one. I also don't need to worry that a Dr will feel 'responsible' for what actions I take while in a wheelchair.

This double standard is sickening . While I used my service dog for psychiatric reasons and not mobility reasons there really should be NO difference.

I have a lot of elderly people in my family right now spread all across the country. At this point if I needed to see a dying relative or attend a funeral I would be literally BANNED from flying to do so. This is discriminatory and illegal.

I would not be surprised to see a class action lawsuit happen if this does not change IMMEDIATELY!

25) Flying is stressful so adding the burden of obtaining a letter exacerbated my PTSD symptoms. Also, I feel discriminated against compared to other disabled people as well as the general public. If my sister is ill I cannot go to help her in a timely fashion.

26) I don't support ESA flying in the cabin, unless they are crated, as there is not the training required to be safe and calm around the general public that service dogs are required to have. Making one general type of disability less than another by requiring them to jump through a bunch of hoops that is not required by other disabilities is demeaning.

I understand the issues that people are having with fakes being brought onto planes and them causing issues, but airlines are able to ask the same questions of service dog handlers that businesses are and if you restrict or remove ESA, you can remove a good deal of the problem.

There is also the issue with education throughout the airlines and airports about service dogs, esa, and therapy dogs. What dogs out of these do and do not have access rights and what they can ask of handlers.

27) I have to get a letter for my Service Dog but being the

caregiver of a dependent child ,I would have to get one for my dependant child's Service Dog as well. Doubling the co pay costs fuel ,time away from therapy,school work,and classes for papers. This makes it cost prohibitive for my family, that is living off of a limited income, to fly anywhere.

28) Because of my letter stating that my dog is a psychiatric service dog, I get judgemental looks and comments from airline staff. Because travel causes me great distress already, knowing that people are also judging me based on my medical equipment usually sends me into a panic attack.

29) I have gone to two psychiatrists trying to get a letter but both feel a service dog is a crutch. I have PTSD and agoraphobia; I cannot leave the house without my service dog. Even with lots of explanation, they both felt medication was a better route even though I've tried several with no benefit. My service dog gave me my life back, but I'm not allowed to fly because these doctors do not like service dogs.

Merriam Webster de fines discrimination as "prejudiced or prejudicial outlook, action, or treatment". Requiring a doctor's note for psychiatric service dog handlers to fly when no other type of service dog (or assistive device) needs one is discrimination. Our dogs still go through hundreds of hours of training to mitigate our disability(ies) and behave properly in public. I have come across many service dogs who were not as well behaved as mine, yet their handlers can fly with them because they have a non-psychiatric disability.

I have to drive 12 plus hours to see a specialist every ten weeks for a different medical condition because I cannot fly. It has been a huge burden. But even though that is a non-psychiatric disability, their is nothing a service dog can do to mitigate it.

It is difficult enough having a psychiatric disability. Trying to explain to doctors that a service dog is a legitimate option and it is my choice what treatment I would prefer, has been infuriating. A blind person has the choice between a service dog and a cane. No one considers the dog a crutch or optional or anything else. I'm tired of the legal discrimination against those with psychiatric disabilities. Please allow us to use our medical devices without discrimination like everyone else!

30) I would have to know in advance that I want to fly, preferably at least a month ahead of time because scheduling with my doctor generally takes about 21 days to get in. Then I would have to take a full day off work to go to the doctor's appointment. I would have to drive partway and then take public transportation for about four-five hours round trip after I drive partway up there. Then I would have to wait at the doctor. I would incur parking fees, public transportation fees, gas mileage, co-pay, and then payment to my insurance for the doctor's letter as well.

My condition is fairly stable and I try to avoid going to the doctor unless needed. If I have to have a doctor's letter to fly this is additional cost not incurred by other people. All because I need a medical alert / medical response service dog who also assists me with mobility in addition to Autism. This also requires substantial pre-planning; if I have to fly due to an emergent situation, how do I get the documentation in time? What if an unplanned event happens that necessitates me flying back home (rather than driving) and I am away from my medical providers to get this note?

Requiring a note puts a substantial burden on me that people without disabilities, or people without certain types of disabilities, do not face. Please let me save my limited money to use for plane tickets and vacation - not medical visits!

31) It doesn't cost me anything for my psychiatrist is supportive of my psychiatric/medical alert service dog because of how much it has helped me to come out of my shell and get back into public instead of staying at home.

32) This is a violation of my Civil Rights. No other group of Service Dog users (guide, hearing, mobility, medic alert) have to have a letter. It is discrimination pure and simple, for only Service Dogs for mental health, PTSD, etc. have to have a Doctors letter. If the DOT insist on allowing Emotional Support Dog (that are not trained Service Dogs) them the DOT can ask for a Doctors letter for them. To ask for a Doctors letter to fly with a ADA qualified Service Dog is discrimination and a violation of my and every disabled person using a Service Dogs Civil Rights. I feel the only way DOT has gotten away with it for as long as they have is because no one has gone to Federal Court and fought for their Civil Rights. I do not believe the DOJ

really finds this "Legal". I feel this act by DOT makes me look and feel like my Service Dog is a "lesser" Service Dog because we have to have and letter and our guide, hearing mobility, medic alert Service Dog friends and family do not. So DOT are people with mental health disabilities lesser citizen's than others types of Service Dogs? Do we have less Civil Rights? The ADA and ADAAA say discrimination is not allowed in any form, but the ACAA and DOT say discrimination is okay if the air lines are having problems with illegal dogs flying in the plane cabins.

[personal message to surveyor omitted]

Carol F. King

33) As disabled people, using a Service Dog we have enough of a challenge without DOT singling us out to be discriminated against and Violating our Civil Rights. If the ACAA said only people with yellow skin that use Service Dogs had to have a letter for their Service Dog. The Nation would be up in arms, treating people differently because of skin color gets attention, but by, DOT and ACAA discriminating against one disability is no big deal. This is why we can't get the courts to take our Service Dog issue seriously.

On the first page of the DOJ web site under ADA it says this law was patterned after the Civil Rights Laws of the 1960's that was "people of color" could get registered and to actually vote.

How ever Disability Rights are not seen as "important" as others. Women's Rights are not (vote) seen as important as independence from England and "people of color" Civil Right yet Women were killed, jailed with out being charged, or allowed to have an attorney just like "people of color". People with Disabilities fought for their Civil Rights. Up until 1990 many states had "ugly laws" to keep the disabled (not pleasant to look at with CP, MS, etc.) out of public and locked up in basements. These are not histories taught in high school history. How many of you were taught in high school what horrors Women and Disabled People went thought to be treated as human?

34) Most doctors require education by the disabled person to even consent to write such a letter, which usually requires multiple visits. They often then write the letter incorrectly the first time, omitting information that might be needed by the

airline. If you bring in a template, they often don't want to write one on the spot because they worry about potential legal consequences for signing a document they're unfamiliar with. This means multiple visits/phone calls/transportation between home and the doctor, and a lot of knowledge on the disabled person's part to educate their doctor to even get a letter... then you get to do it all over again in a year if you get a new doctor. Forget emergency flights if you didn't think to have the document written ahead of time in the first place and have 24 hours advance notice to give the airlines for your "emergency".

35) When flying last minute, I don't have time to get an updated letter.

36) Due to how my medical care is currently being paid for, I am only able to see my treating doctor every 6 weeks and she is unable to assist me in any way over the phone. If I were to need a letter with any type of urgency, it would be impossible. Additionally, not all healthcare staff view service dogs the same. I have been lucky in that my doctors have been supportive and included my service dog as part of my ongoing treatment plan. However, even with hospital/medical staff, I have faced discrimination regarding my service dog in different situations. I mention this since if I tried to acquire a letter from healthcare staff (in a last minute case scenario) that were not familiar with my history/situation; they may not be willing to write a letter.

I feel that requiring a letter is discrimination regarding what type of disability someone is allowed to use a service dog for. I feel that requiring a letter is discrimination regarding what qualifies someone to be disabled and to be able to use a service dog to mitigate their disabilities. I believe that requiring a letter is also discrimination because it allows denial to a group of people with "certain disabilities" if we/they are unable to obtain the letter.

Furthermore, it is unfair for those users of service dogs that do not have current access to medical care, money to cover the cost associated with a visit to a healthcare provider, accessible transportation and all of the other burdens (financial and otherwise) that would come with having to obtain a letter.

Thank you for giving this report and USAUSA's recent comment your consideration.

Sincerely,
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