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Liv Vaughn Chapman and Blane A. Workie
Office of the Aviation Enforcement and Proceedings
US Department of Transportation
(202) 366-9342
accesscommittee@dot.gov

Mses. Chapman and Workie:

I'm writing this letter to nominate our organization—and specifically, our Director of Government Relations, Bradley W. Morris—to represent the stakeholder category of "Advocacy Groups representing service animal users" on the Accessible Air Transportation (ACCESS) Advisory Committee. I will divide this letter according to the enumerated requests in the convening notice.

(1) Bradley W. ("Brad") Morris, MA, CPhil, Director of Government Relations, (510) 367-5124/(805) 876-4256, brad.psdp@gmail.com

Mr. Morris is qualified to address service animal issues. He would represent the interests of service animal users.

(2) This letter serves as his letter of support from a nonprofit organization.

Brad Morris has been extensively involved within the service animal community and service animal user advocacy for a decade. He may be of general assistance on the committee not only because of his expertise regarding service animals, but because he is a wheelchair user who uses closed captioning when available.

Mr. Morris has authored many white papers, subject matter articles, and advocacy letters that have effected change at state and federal levels. He has been an integral part of our organization since its inception in 2012, acting as its Secretary, Co-Treasurer, and Director of Government Relations, and was involved with a similar service animal user organization for many years before then.

Mr. Morris has lived and many times flown with a service animal user over the past decade, and is personally familiar with the access challenges and day-to-day minutiae of life with a service animal in all aspects of public life. He is passionate about fair and just access for service animal users that is reasonable for all stakeholders.

(3) Brad Morris is fully committed to actively participating in good faith in the development of the rule under consideration. He spent years teaching critical reasoning classes at a major university, emphasizing the need to understand and accommodate others' interests in order both to develop one's own views and to respectfully persuade. Mr. Morris believes in collaborative negotiations that are not based on the assumption of a zero-sum game, but allow room for creative solutions that satisfy everyone.

Mr. Morris has already traveled to meet with a dozen cross-disability organizations in Washington, DC regarding service animal access possibilities under new ACAA regulations. He has also contacted other service animal user advocacy organizations and industry groups to build consensus. In essence, on behalf of our organization he has demonstrated extraordinary initiative in honoring the spirit of the Reg-Neg process.

(4) In 2003, Mr. Morris graduated with honors in Philosophy and a double-major in Psychology from the University of North Carolina, Chapel Hill. He attended the University of California at Davis 2005–2011, earning MA and CPhil degrees in analytic philosophy.

Mr. Morris is trained as an ombudsperson and is experienced at dispute resolution, especially among individuals with psychiatric disabilities. He has six years of teaching experience at the university level and has won awards

for his contributions to teaching and service to his department. He is currently *exclusively* devoted to furthering the mission of Psychiatric Service Dog Partners, and has been so committed since early 2013.

Mr. Morris is qualified both as an expert and a representative. He is a representative through a decade of practical daily experience with a service animal user in all aspects of life, and through active participation in and facilitation of local and nationwide service animal meetings and trainings. He is an expert through years of conscientious research and responsibility for drafting our organization's position statements and successful advocacy comments, as well as orchestrating collaborations among stakeholder groups in a field with few others taking up the reins of advocacy.

(5) Brad Morris meets all the Committee eligibility requirements.

By representing service animal users—with special knowledge of the subset partitioned under current regulations—Mr. Morris strongly represents "a significant stakeholder group that will be substantially affected by the final rule". As detailed above, he also provides expertise: he would bring "essential knowledge, expertise and/or experience regarding accessibility and the topic area(s) of interest that will enrich the discussion of the available options and their respective costs and benefits". He has been cultivating such expertise for years.

Regarding balance in the slate of selected applicants, we are genuinely concerned that an organization not tuned to the needs of those who use service animals for psychiatric disabilities would not be able to adequately represent the interests of this key group in the proceedings. We are not at all opposed to another service animal user advocacy group joining us at the table. The issue we have found is that while we can address the needs both of service animal users in general and psychiatric service animal users specifically, the latter have been historically been inadequately honored when psychiatric service animal users are not explicitly represented.

If we are not selected to represent service animal user interests, we urge DOT to exercise care in selecting an organization or organizations that represent service animal *users*, rather than service animal *programs*. Unfortunately, we have witnessed some organizations advocate more for the interests of their business model than for the end user, and this would be contrary to the aims of the ACCESS Advisory Committee.

As indicated above, Mr. Morris is willing to participate fully: he is "able and willing to attend the listed meetings and associated working group conference calls, bring in other experts from the applicant's organization as needed and relevant, bargain in good faith, and generally contribute constructively to a rigorous policy development process".

Mr. Morris is a senior level official who can commit our organization. In addition, our organization has an ACAA committee with which Mr. Morris would be able to confer. This committee includes our board of directors and an involved, long-time community member. Our directors' qualifications can be gleaned from their biographies here:


<http://www.psychdogpartners.org/board-of-directors/board-members>

With the input of our ACAA committee, Mr. Morris drafted a practical proposal for a new system of service animal flight access. We have updated this proposal with the assistance of other organizations, and Mr. Morris has written a walkthrough (guide) of the reasoning behind the proposal. He subsequently added an addendum to address concerns voiced through collaborations with other groups.

I mention these resources because we believe—and have been told by an attorney we consulted—that they would be instructive to Reg-Neg participants. The guide is available through the following page, on which the proposal and overwhelmingly supportive community survey results are also linked:

<http://www.psychdogpartners.org/board-of-directors/board-activities/advocacy/acaa-design-challenges-solutions>

Respectfully,


Veronica Morris, PhD
President, Board of Directors
on behalf of the ACAA Committee of
Psychiatric Service Dog Partners

bwm

Psychiatric Service Dogs Partners' purpose is to promote the mental health of people using service dogs for psychiatric disabilities by educating, advocating, providing expertise, facilitating peer support, and promoting responsible service dog training and handling.