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Lillian Miller, Program Analyst
Federal Aviation Administration
Office of Airports, Airport Engineering Division (AAS-100)
800 Independence Ave. SW., Washington, DC 20591

RE: Docket Number FAA-2016-4796, Service Animal Relief Area (SARA) circular draft

Ms. Miller:

Psychiatric Service Dog Partners, an advocacy organization for service animal users, is pleased to see the current state of FAA's 2014 efforts to develop guidance regarding service animal relief areas (SARAs) in and around airports. We were informally involved in those efforts and sincerely appreciate the present results.

The draft circular contains many very practical provisions, including the requirement that airports consult with a service animal organization regarding the design that would work best in each location. In the interest of making this requirement easier to fulfill, I recommend Psychiatric Service Dog Partners be listed among the service animal organizations with which airports may confer. Part of our work involves consulting with transportation authorities to collaborate and advise, from coffeeshop meetings with local transit officials, to serving on DOT's current ACCESS Advisory Committee to update the definition of "service animal" in the ACAA regulations.

Our other recommendation pertains to the confusing presentation of the definition of "service animal". I'll briefly explain, but useful details—and other points—are available in the worthwhile entry by John Ensminger:

<http://doglawreporter.blogspot.com/2016/05/transportation-department-gets-specific.html>

The language in the draft makes it seem as if current regulations are being quoted when it comes to the definition of a service animal, yet the phrase "emotional support" is inserted, going beyond the regulatory language. What is additionally confusing about this is that the "emotional support" example is given under the heading of trained disability-mitigating behaviors. Those in the service animal community, and DOJ, do not recognize the provision of emotional support as a trained work or task item.

Please note there are several work and task items that psychiatric service dogs can be trained to carry out to mitigate a psychiatric disability. However, "emotional support" is widely recognized as not being a trained behavior, but as the provision of disability relief through the mere untrained presence (or untrained activities) of the animal. In other words, the provision of "emotional support" from a canine is someone's disability being helped just by their dog being a dog. This is not meant to discount this benefit in appropriate contexts.

We recommend avoiding these issues altogether by not providing a detailed definition of "service animal"; a simple reference to the updatable regulation could suffice. This would be an excellent option, given the ongoing renovation of the ACAA definition, and it would fit with our happy expectation that pets and TSA's working dogs will also benefit from SARAs.

Respectfully,

Bradley W. Morris, MA, CPhil
Director of Government Relations
on behalf of the Board of Directors

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.