



United Service Animal Users, Supporters, and Advocates¹
Partnering for reasoned advocacy

Flight Access Survey Report

May 22, 2018

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

RE: DOT-OST-2018-0067 & DOT-OST-2018-0068; Survey report
regarding disability-assisting animals

Ms. Workie:

On April 4th, an attorney in your office indicated to us that your office generally crafts guidance only when either formal complaints or significant data makes it clear that such guidance is needed.² We extrapolate that DOT also prefers to have data to justify its regulation and enforcement changes. We therefore offer this Flight Access Survey Report to aid your office in developing new regulations, guidance, and enforcement priorities on several timely issues related to the use of disability-assisting animals.

Thank you for giving your consideration to this report, USAUSA's previous

¹ USAUSA is an informal collaboration of diverse stakeholders. See <https://www.psychdogpartners.org/usausa>

² Email excerpt: "With respect to whether the Department will be issuing guidance on basic economy seating programs, we traditionally decide whether or not to issue a guidance document when we receive a significant number of complaints about an issue or we have received data indicating that there is significant concern in the disability community about an airline policy or practice."



survey report ("2016 survey report"),³ and USAUSA's post-Reg Neg⁴ compromise recommendations ("2016 compromise comment")⁵. We are confident these documents not only reflect true middle-ground perspectives informed by dialogue across stakeholder types, but equally as important, they are anchored in valuing safety, disability rights, and practical considerations above narrow self-interest.

We expect this report to be revelatory for all stakeholders.

Sincerely,
Bradley W. Morris, MA, CPhil
Director of Government Relations
Psychiatric Service Dog Partners
brad@psych.dog

Jenine Stanley
Consumer Relations Coordinator
Guide Dog Foundation for the Blind
and America's VetDogs
jenine@guidedog.org

-
- 3 "ACAA Third-Party Documentation Requirements: Survey of Psychiatric-Disability-Mitigating Animal Users": <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-DOT-Info-Request.pdf>
 - 4 "Reg Neg" refers to the Negotiated Rulemaking process conducted by DOT among stakeholder representatives known as the Advisory Committee on Accessible Air Transportation (ACCESS Advisory Committee), concluding in 2016. <https://www.transportation.gov/access-advisory-committee>
 - 5 "Pre-NPRM Comment: DOT's ACAA Service Animal Regulations": <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-Pre-NPRM-Comment.pdf>



Contents

This report is organized in five sections as follows.

§1. Historical context	4
§1.a. <i>Backdrop</i>	4
§1.b. <i>Development and regression</i>	5
§1.c. <i>Discrimination based on disability type</i>	6
§1.d. <i>Outdated disability models incubate fresh barriers</i>	8
§2. Survey results summary	11
§2.a. <i>General trends</i>	11
§2.b. <i>Quantitative summaries</i>	12
§2.c. <i>Previous results</i>	13
§2.d. <i>Implications summary</i>	13
§3. Survey results implications	14
§3.a. <i>Public disapproval as the clincher against discrimination</i> ... 14	
§3.b. <i>Prime directive vs. extreme anti-misuse measures</i>	15
§3.c. <i>"Basic Economy" de facto discriminates, avoidably</i>	18
§3.d. <i>Training+ for safety and crate-free access</i>	21
§3.e. <i>Ways to improve confidence in airlines</i>	22
§4. Survey methodology	25
§4.a. <i>Distribution</i>	25
§4.b. <i>Survey page content, text</i>	26
§4.c. <i>Survey page content, image</i>	29
§5. Data and analysis	31
§5.a. <i>Quantitative analysis of quantitative responses</i>	31
§5.b. <i>Quantitative analysis of qualitative responses</i>	39
§5.c. <i>Qualitative responses</i>	41



§1. *Historical context*

Here we chart where we find ourselves on the long arc of history, with a targeted purpose. In this section, our goal is to lift the lid on historically hidden biases to reveal how common preconceptions draw us into inadvertent—but very real—discrimination. We would not do this if it were not so clearly essential to understanding our survey results in the current climate. If DOT is not given the chance to understand the mistakes of the past from the perspective of the rights holders themselves, we fear the disability community will continue to bear the costs of those mistakes far into the future.

§1.a. *Backdrop*

Not very long ago at all, businesses (including airlines) would assume things about people with disabilities that would lead to discriminatory treatment. Wheelchair users might be forced to sit on a towel on an airplane seat, even in the absence of bladder or bowel issues. Someone with a deformity or unusual medical equipment might be forced to get a medical certificate to fly. Some localities even had "ugly laws" that made it legal for businesses to turn people away—or have people arrested—based on their disabilities.^{6,7}

Not all airlines or employees would discriminate in egregious ways based on disability. However, a sure fire recipe for this mistreatment is to couple still-present biases with a lack of human rights laws designed to keep those drives in check. DOT officials cannot eliminate prejudice, so their task is to rise above and craft laws that do not reinforce society's ill-considered impulses.

Such iniquitous motivations may be as backward as social Darwinism and eugenics, or as condescendingly well-intentioned as a medical (or charity) model of disability that dominates the popular imagination. In such models, people with disabilities are looked down on as objects of pity or of medical attention—objects to be handled, "fixed", or have their access controlled by third parties.^{8,9}

Any one of us can acquire a disability or face an unexpected disabling

6 <https://www.snopes.com/fact-check/ugly-laws/>

7 Beyond this, benignly unusual behavior might land a person in a filth-hole of an asylum for an indefinite stay and torturous treatment.

8 This contrasts with, for example, a social model of disability. According to such a model, most of the barriers faced by people with disabilities derive from correctable issues in society. The objects of improvement, therefore, are social or environmental factors, not the individuals with disabilities.

9 Of course, anyone facing economic or medical difficulties might appreciate access to the appropriate assistance. Assistance or accommodations differ from gatekeeping or other methods of control.



condition at any time. Regardless, it's vital DOT finally recognize a basic axiom of disability rights and the freedom of movement.¹⁰ *It is a violation of disabled individuals' human rights to make the possibility of engaging in the world hinge on gaining some official "approval"*. Having a disability should not mean having to wear a special badge or obtain encumbering documentation others don't in order to travel.¹¹

It is against this backdrop that the Air Carrier Access Act was fought for and passed.¹² The crux of the ACAA is so straightforward, it is well-worth a quick review (bold emphasis added):

49 USC §41705. Discrimination against handicapped individuals
*(a) In General.—In providing air transportation, **an air carrier, including (subject to section 40105(b)) any foreign air carrier, may not discriminate against an otherwise qualified individual on the following grounds:***
*(1) **the individual has a physical or mental impairment that substantially limits one or more major life activities.***
*(2) **the individual has a record of such an impairment.***
*(3) **the individual is regarded as having such an impairment.***¹³

This is the legislation under which DOT is supposed to articulate disability access regulations for flying. The prime directive of such disability rights laws is to facilitate access and minimize discrimination on the basis of disability.

§1.b. *Development and regression*

David Capozzi noted at the DOT-hosted 30-year celebration of the ACAA that:¹⁴

10 See Article 13 of the United Nations' 1948 "Universal Declaration of Human Rights".

<http://www.un.org/en/universal-declaration-human-rights/index.html>

11 This is not some flippant reference to Nazi Germany, where people with disabilities were the first to go. This is a counterpunch to thinking and laws that are prevalent around the world and in the US today.

See the January 19, 2018 press release from Psychiatric Service Dog Partners, "Delta Air Lines' planned service animal policy strives to balance safety with human rights concerns, leaves room for improvement", which touches on this. The sentiments in this release received sign-on support from Sarah Grady of the Service Dog Society and Laurie Gowelko of Service Dog Express.
<https://www.psychdogpartners.org/press-releases/delta-planned-service-animal-policy-leaves-room-improvement>

12 To include a badge prohibition at 14 CFR §382.33(b)(4): https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_133

13 <https://www.gpo.gov/fdsys/pkg/USCODE-2011-title49/html/USCODE-2011-title49-subtitleVII-partA-subpartii-chap417-subchapl-sec41705.htm>

14 David M. Capozzi is the Executive Director of the United States Access Board; he was involved with the construction and passing of the ACAA. The celebration was on October 13, 2016, and the quotation was taken from a panel discussion and confirmed by Brad Morris with Mr. Capozzi



Overall, the biggest accomplishment of the ACAA regulations was moving away from the medical model of disability. Disability rights were seen as civil rights.

In concert with Mr. Capozzi's claims, advocates today see the parallels between race-based civil rights struggles and disability-based civil rights struggles.¹⁵ We have not crossed a magical barrier into a golden age of enlightenment. These fights for rights did not end with the passage of the Voting Rights Act or the Air Carrier Access Act. Society is not free from prejudice and misconceptions, and it is still possible for people in power not to understand how their assumptions and models of disability are unnecessarily railroading their actions toward systematic discrimination.

Let us be frank so we have a chance to remedy some of these ills. There is hope, but the present situation is bleak for those who use animals to assist with their disabilities.

There are two general worries we will articulate: (1) DOT regulations encourage discrimination on the basis of disability type and (2) DOT appears to subscribe to outdated models of disability that facilitate creating barriers to access rather than prioritizing access for people with disabilities.

§1.c. Discrimination based on disability type

While we would like to be optimistic about future regulations, DOT's current regulations discriminate on the basis of disability type. Discriminating purely based on disability type is a way to discriminate on the basis of disability, which is fundamentally contrary to the ACAA.

The ACAA would not permit an airline to provide a wheelchair accommodation upon request to someone with gait difficulty due to multiple sclerosis (MS), but require third-party documentation from another person because their diagnosis is amyotrophic lateral sclerosis (ALS). Nor would it permit an airline to provide a required accommodation without hassle to individuals who are blind, yet require advance notice and third-party

immediately after the discussion.

¹⁵ Respectively, to better understand disability rights as civil rights, see the article by Brad Morris, "Flying with a disability: More barriers for the marginalized?", under Psychiatric Service Dog Partners' February 22, 2018 press release ("Delta 'enhancements' keep updates legal, but immoral") and see "Potential PR nightmare: how airlines choose to discriminate" to better understand the violations of civil rights virally infused in air travel.

<https://www.psychdogpartners.org/press-releases/delta-enhancements-immoral>

<https://www.psychdogpartners.org/board-of-directors/board-activities/advocacy/pr-nightmare-airlines-choose>



documentation to provide a similar required accommodation if the passengers are deaf.

Why would we claim that DOT's ACAA regulations encourage discrimination based on disability type?^{16,17} For service animal users with *mental health-related* disabilities, the regulations allow airlines to require advance notice and a medical professional's letter to prove one's disability.

Due to these regulations, most airlines do choose to put in place significant barriers to access for persons with mental health-related disabilities who use a service animal trained for work or tasks and for public access. These same burdens are not prescribed for people with non-mental health-related disabilities who use service animals. The only difference between these categories is disability type.¹⁸

By encouraging—or even by explicitly allowing—discrimination based on disability type, DOT has fallen outside of its most basic ACAA mandate from legislators. As USAUSA's 2016 survey report clearly indicates, this state of affairs has perpetrated a mass of injustices and a mess for all sides.¹⁹

At the time (2009), a large group of psychiatric service dog users warned DOT about the deleterious effects that discriminatory and burdensome regulations would have on them.²⁰ Notwithstanding these warnings, DOT put off reconsidering the regulations until around 2016 with the Reg Neg.

The Reg Neg ultimately failed to produce a consensus on an overall package, though quite notably, compromise positions were reached on

16 See 14 CFR §382.27(c)(8) & §382.117(e):

https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=879531fcdbd5fd2b69262d8ab7f3dce6&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_127

https://www.ecfr.gov/cgi-bin/text-idx?SID=5aa2959003ebb44d09d6d57318a9eb9a&node=se14.4.382_1117&rgn=div8

17 As earlier referenced, the situation is alternatively described in "Potential PR nightmare: how airlines choose to discriminate": <https://www.psychdogpartners.org/board-of-directors/board-activities/advocacy/pr-nightmare-airlines-choose>

18 Emotional support animals, or ESAs, are a different category. While under DOT, ESAs are for mental health-related disabilities (a restriction not present in HUD's FHAct ESAs), ESAs are not trained to do work or tasks to mitigate a disability. It is also not reasonable to expect ESAs to be trained to behave in flight-like environments.

19 Consider even just this statistic from page 5: "Over three out of four people surveyed [people who use a psychiatric service dog or an emotional support animal] have either not flown or have flown less because of these factors [the burdens placed on them and not on other service animal users]." <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-DOT-Info-Request.pdf>

20 See the petition from Psychiatric Service Dog Society. <https://www.regulations.gov/document?D=DOT-OST-2009-0093-0001>



several fronts. These positions are best represented in USAUSA's post-Reg Neg 2016 compromise comment to DOT,²¹ with the exception that most airline representatives had no predilection for human rights-centered models of disability.

§1.d. *Outdated disability models incubate fresh barriers*

The flight context differs significantly from those pondered by the Department of Justice's Title II and Title III Americans with Disabilities Act regulations.²² That being said, this difference does not justify a departure from the basic premise that in the United States, disability rights are civil rights—guaranteed not merely by nature or ethics, but by law.

The requirement to obtain a medical professional's letter to prove one's disability is a prime example of DOT regulations using an outdated medical model of disability that DOJ has eschewed and rebuked as "[...] burdensome, and contrary to the spirit, intent, and mandates of the ADA".^{23,24} Looking to present developments, we are given no reassurance

21 <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-Pre-NPRM-Comment.pdf>

22 These differences are perspicuously detailed in a document drafted by Psychiatric Service Dog Partners before the Reg Neg. See especially §1 of "ACAA Design Challenges & Solutions", which enumerates these considerations and details their fallout:

(1) some pets are allowed on board when people pay fees

(2) the environments of airports and cabins of airplanes in flight are more challenging than average for an animal (humans, too!)—including in terms of airport activity and stress, and airplane crowding and confinement

(3) gatekeepers (employees) are more in the position of actively verifying an animal's status

<https://www.psychdogpartners.org/board-of-directors/board-activities/advocacy/acaadesign-challenges-solutions>

23 DOT's Congressional mandate through the ACAA does not differ significantly from DOJ's through the ADA. See 42 USC §12101(b)(1), where the simple ADA mandate is "the elimination of discrimination against individuals with disabilities". <https://www.gpo.gov/fdsys/pkg/USCODE-2010-title42/html/USCODE-2010-title42-chap126.htm>

24 See DOJ's 2010 analysis from updating its service animal regulations ("Appendix A to Part 36—Guidance on Revisions to ADA Regulation on Nondiscrimination on the Basis of Disability by Public Accommodations and Commercial Facilities", "Section-By-Section Analysis and Response to Public Comments"):

"Some commenters suggested that a title III entity be allowed to require current documentation, no more than one year old, on letterhead from a mental health professional stating the following: (1) That the individual seeking to use the animal has a mental health-related disability; (2) that having the animal accompany the individual is necessary to the individual's mental health or treatment or to assist the person otherwise; and (3) that the person providing the assessment of the individual is a licensed mental health professional and the individual seeking to use the animal is under that individual's professional care. These commenters asserted that this will prevent abuse and ensure that individuals with legitimate needs for psychiatric service animals may use them. **The Department believes that this proposal would treat persons with psychiatric, intellectual, and other mental disabilities less favorably than persons with physical or sensory disabilities.** The proposal would also require



that DOT intends to relegate such models to the past and turn instead to a human rights-based approach.²⁵

A human rights approach to disability could allow deterrent consequences to knowingly and willfully committing fraud to obtain goods or services. It could tolerate a system where individuals verify they understand the rights and responsibilities pertaining to travel with a service animal when they intend to fly—the system can assume traveler *ignorance* if the consequences are not overly burdensome.

What a human rights approach cannot abide is a system that assumes the *guilt* of people with disabilities.

At this point, we cannot afford to mince words; too much hangs in the balance. *Requiring people with disabilities to seek, obtain, present, or carry special paperwork from a third party, as if their innocence must be proven for them to exist as others do in society, is an authoritarian violation of human rights.*²⁶

Airlines are in the midst of increasing the barriers through further third-party documentation procedures not outlined or anticipated by existing regulations on which the public could have commented. Delta²⁷ is among

persons with disabilities to obtain medical documentation and carry it with them any time they seek to engage in ordinary activities of daily life in their communities—something individuals without disabilities have not been required to do. Accordingly, **the Department has concluded that a documentation requirement of this kind would be unnecessary, burdensome, and contrary to the spirit, intent, and mandates of the ADA.**" (bold emphasis added)

While DOT and DOJ are separate entities with separate purviews, it's hard to understand how the same basic mandate could be handled from such divergent perspectives when it comes to these core issues.

<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=1fcb95e0991fa49ff719bbe362cdddc1&ty=HTML&h=L&r=APPENDIX&n=28y1.0.1.1.37.6.32.8.13>

25 See DOT's May 16, 2018 "Interim Statement of Enforcement Priorities Regarding Service Animals" and "Traveling by Air with Service Animals Advance Notice of Proposed Rulemaking (ANPRM)", respectively.

<https://www.regulations.gov/document?D=DOT-OST-2018-0067-0001>

<https://www.regulations.gov/document?D=DOT-OST-2018-0068-0001>

26 Our 2016 survey report, performed at the request of DOT, clearly bears out the severe impacts of the current regulations' burdens. <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-DOT-Info-Request.pdf>

27 See Delta's February 2, 2018 news release (a follow-up to an initial January release), "Delta service and support animal policy effective March 1, enhancements added": <https://news.delta.com/delta-service-and-support-animal-policy-effective-march-1-enhancements-added>

Delta's policy page is linked here: https://www.delta.com/content/www/en_US/traveling-with-us/special-travel-needs/service-animals.html



these airlines, as are United²⁸ and American²⁹. Some airlines have made it clear they would extend such barriers to all service animal users if they could.³⁰ While this is happening, DOT has taken a wait-and-see approach, challenging our crudest optimism.³¹ In an Advance Notice of Proposed Rulemaking (ANPRM), DOT considers expanding the burdens and cementing them in new regulations.³²

We are not merely frustrated, but are at times distraught that DOT is considering whether to further push discriminatory, burdensome regulations

28 See United's February 1, 2018 news release, "We update our policy around emotional support animals". Note that United does not even recognize psychiatric service animals in the release, even though United subjects users of psychiatric service animals to the same increased burdens as ESA users: <https://hub.united.com/united-emotional-support-animal-policy-2530539164.html>

United's policy page is linked here: https://www.united.com/web/en-US/content/travel/specialneeds/disabilities/assistance_animals.aspx

29 See American's May 14, 2018 news release, "American Airlines Announces Changes to Emotional Support Animal Policy", which is similar to United's in not mentioning psychiatric service animals: <http://news.aa.com/default.aspx?SectionId=5cc5ecae-6c48-4521-a1ad-480e593e4835&LanguageId=1&PressReleaseId=bd1f806b-fb0e-4a71-bac0-2888c587da1c>

American's policy page is linked here: <https://www.aa.com/i18n/travel-info/special-assistance/service-animals.jsp>

It speaks volumes to us that an airline feels emboldened in the current climate to go so far in ignoring human rights as to have a medical release for people with disabilities to sign. The language just below is on American's "Animal Sanitation Form" and "Mental Health Professional Form":

"I, (print name of customer or parent/legal guardian), consent to American Airlines collecting and processing personal information, including medical information, for use in authorizing travel with the emotional support animal named above and for the travel date(s) named above."

30 As an example beyond the many conversations at the Reg Neg, Delta attempted to extend third-party documentation and advance notice requirements to all service animal users in their initial barrier expansion. See Delta's January 19, 2018 news release, "Delta introduces enhanced requirements for customers traveling with service or support animals effective March 1", which states that "The guidelines, effective March 1, require that all customers traveling with a service or support animal show proof of health or vaccinations 48 hours in advance." Delta was soon forced to walk this plan back to only apply to the categories for which DOT allows extra burdens. <https://news.delta.com/delta-introduces-enhanced-requirements-customers-traveling-service-or-support-animals-effective>

31 See the January 19, 2018 press release from Psychiatric Service Dog Partners, "Delta Air Lines' planned service animal policy strives to balance safety with human rights concerns, leaves room for improvement", which quotes a DOT official as saying:

"The Department is aware of the new Delta Air Lines policy regarding service animals. Air travel should be safe for passengers and airline employees and accessible for all passengers. We will monitor Delta's policy to ensure that it preserves and respects the rights of individuals with disabilities who travel with service animals. Under DOT's current rules implementing the Air Carrier Access Act, airlines are required to accommodate passengers with disabilities who depend on the assistance of service animals within limits. Airlines are not required to accommodate unusual service animals, such as snakes, reptiles, ferrets, rodents, and spiders. Also, an airline may refuse to carry other animals if the airline determines there are factors precluding the animal from traveling in the cabin of the aircraft, such as the size or weight of the animal, whether the animal would pose a direct threat to the health or safety of others, whether it would cause a significant disruption of cabin service, and whether the law of a foreign country that is the destination of the flight would prohibit entry of the animal. In enforcing the requirements of Federal law, the Department is committed to ensuring that our air transportation system is safe and accessible for everyone."



that rely on outdated models of disability, masked in safety concerns for all passengers. While we write of models, this is not a matter of theory. As our survey results show, this is a matter of the very real and quite dire impacts this situation has in the lives of people with disabilities.

After these interlocking years of rights reductions, DOT is faced with an historic decision. DOT officials need to decide whether to re-adopt a human rights perspective on disability access, as DOT originally adopted and as the ACAA crafters intended. The other option is to ignore the civil rights concerns and instead push for even more of a medical model of disability, continuing to violate the ACAA mandate. This is the option that incubates barriers by treating people with disabilities as guilty until proven innocent.

This is the unfortunate history and present context in which our community completed the flight access survey. We believe the results below bear this out and beg for a sea change in a way we hope DOT will hear and understand.

§2. Survey results summary

§2.a. General trends

The community of service animal users and ESA users would usually be described as anything but univocal. However, our survey reveals reliably deep dissatisfaction with DOT's regulatory approach and the direction some airlines' recent interpretations are straining the regulations. General trends in the quantitative and qualitative responses indicate the following.

On average, a person who uses an animal to assist with their disability:

- **is extremely likely to see unacceptable injustice in the current ACAA regulatory approach,**
- **is very likely either not to fly or to fly much less due to the costly, discriminatory burdens they face (such as various third-party documentation requirements), and**
- **has very little confidence that the current approach is safe, reliably executed, or has any significant impact on**

<https://www.psychdogpartners.org/press-releases/delta-planned-service-animal-policy-leaves-room-improvement>

32 As referenced earlier: <https://www.regulations.gov/document?D=DOT-OST-2018-0068-0001>



misuse or misinterpretation of the laws.

To be clear, the data set gives the unmistakable impression that the present situation and its trajectory are bleak, failing in the ACAA's most basic objectives. There is hope, in that the data also lay breadcrumbs toward manners of remedy and paths to success.

§2.b. Quantitative summaries

The survey was advertised and widely distributed to service animal users and emotional support animal (ESA) users. The survey received 926 responses. The exact prompts and data are in sections below, but responses to each prompt are summarized here.

- Less than 5% of respondents think it would be acceptable for airlines to put up more barriers for people with one type of disability vs. another
- More than four out of five respondents value protecting access for people with disabilities more than reducing the number of people misusing the laws
- If respondents had to get veterinary records or a health certificate before flying, they estimate it would cost \$115, take 8 days total, and take 6 hours of personal time
- Almost two-thirds of respondents expect their veterinarians would not be willing to sign a statement predicting whether an animal would behave in a flying environment
- On a five-point scale where 5 is "totally discouraged", respondents are discouraged from flying at a level of 3.5 at the prospect of having to provide one type of third-party documentation, while having to provide two types would discourage at a level of 4.2
- Respondents were discouraged from buying cheaper "basic economy" tickets with restrictive policies at a level of 4.3 out of 5 (where 5 is "totally discouraged"), due to their disability-related needs
- Around 95% of respondents think that for crate-free flight access, animals should be both trained and accustomed to behaving in similarly stressful public places; almost 9 out of 10



are concerned about untrained or stressed animals interfering with their animals when they fly

- Where 1 is "not at all confident" on a scale that ends at 5 with "totally confident", respondents are only confident at a level of 1.9 that airline staff members interpret disability policies accurately and appropriately

In addition to these quantitative results, by far the most commonly voiced concern in the qualitative responses (mentioned in 62%) pertains to the difficulties encountered and expected as a result of existing and anticipated barriers to travel. Following this among the popular sentiments are concerns about other animals' behavior and training (38%) and trust issues when it comes to airlines and government agencies (19%).

§2.c. Previous results

The results of our 2016 survey of psychiatric service animal users and ESA users³³ are of particular relevance next to the above figures:

- 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 required medical paperwork is \$156.77, it takes an average of 30.6 days to see a medical professional and obtain a letter, and 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.

§2.d. Implications summary

The implications of the above figures are far-reaching and detailed in the next section. However, we will summarize some of these implications here:

- Whether disability rights laws discriminate based on disability type should not depend on a public approval rating—but the public does in fact disapprove of this discrimination
- DOT must recognize the ACAA anti-discrimination mandate

³³ <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-DOT-Info-Request.pdf>



and prioritize access for people with disabilities over extreme burdens on them that fail in trying to stop misuse of laws

- "Basic Economy" policies de facto discriminate, but this is easily remedied with statements of exceptions for disability-related needs
- Animals need to be both trained and accustomed to behaving in flight-like environments for crate-free cabin access and others' safety
- People with disabilities aren't confident in airlines employees' execution of access laws, but there are ways all parties can improve

§3. Survey results implications

While the survey results have extensive implications, in this section we focus on the proximate consequences as they relate to concerns DOT and our community members have expressed.

§3.a. Public disapproval as the clincher against discrimination

As we detailed in §1.c., DOT's ACAA regulations encourage airlines to discriminate on the basis of disability type and airlines oblige. We believe this is fundamentally contrary to the ACAA's mandate to DOT, which is to excise discrimination on the basis of disability. Irrespective of the law, we believe this discrimination is ethically unacceptable. Our community very clearly agrees it is not acceptable for airlines to make access harder for individuals with one type of disability vs. another, at a rate of 19 out of 20 people being against this.

Airlines seem to claim, without hard data,³⁴ that the rate of law misuse among people claiming to have one type of disability is higher. *Even if* airline anecdotes were true, that would not justify extra barriers on the

³⁴ Complicating this further, it would be hard to acquire much in the way of hard data to substantiate airlines' claims of *fraud*, specifically. First, it is difficult to prove someone knowingly and willfully made misrepresentations to gain some benefit. Second, people (including airline employees) tend to work from prototypical understandings of service animals and thus easily misidentify non-prototypical service animal or ESA users as illegitimate. Third, and related to the previous point, people with or without disabilities who seek to fly with their animals can easily lack an understanding of the laws—our experience indicates most people do not even understand that having an ESA requires having a disability, let alone that DOT expects ESAs to be public access trained. This means that when an airline employee sees any such *misuse* of the laws, the employee likely may misinterpret this misuse as fraud.



basis of that disability type. That would be analogous to the Department of Justice encouraging local law enforcement agencies to systematically detain people of color without cause,³⁵ if those agencies complained that people of color presented them problems at a higher rate. The fact that we're dealing with a marginalized group of people with disabilities, rather than people of color, does not give us license to abandon basic principles of civil rights.³⁶

While the moral argument should be sufficient, it is even better when the principles are woven into popular thinking. A full 70% of Americans oppose racial profiling, and 86% of African-Americans and Hispanics oppose it.³⁷ The fact that over 95% of our survey population opposes disability-type-based discrimination should be the final, belated nail in the coffin of the current regulatory scheme, which is just as unconstitutional.³⁸

§3.b. *Prime directive vs. extreme anti-misuse measures*

The non-discrimination prime directive of the ACAA is supposed to ensure access to air travel for people with disabilities. Understandably, DOT must carry out this directive while balancing safety, disability rights, and practical considerations. Notably, DOT's prime directive is not to prevent fraud. It is a worthy goal to prevent fraud and other misuse of the laws (such as due to misunderstandings or poor procedures), but this is entirely secondary.

DOT officials are faced with a choice between advancing two sorts of systems. The first sort of system attempts to stop fraud (but doesn't seem to) by encouraging burdens that cost people with disabilities a lot of money and time, thereby discouraging them from flying to a high degree. The second sort of system is not draconian in trying to flame-throw fraud, but focuses on education to mitigate the misuse of laws—which does not unduly cost people with disabilities money or much time, and thus does not discourage them from flying.

35 If one cares to have a closer analogy, it would more specifically be like singling out darker-skinned people of color for worse treatment. While there is evidence this actually is what happens, our hope is that it is crystal clear it would be unacceptable to allow policies to back up this kind of prejudice.

36 While it should not be necessary for regulations to spell out that discrimination based on disability type is not okay, for comparison, DOJ's Title III ADA regulations actually do spell this out at 28 CFR §36.301(a): "A public accommodation shall not impose or apply eligibility criteria that screen out or tend to screen out an individual with a disability or any class of individuals with disabilities from fully and equally enjoying any goods, services[...]" <https://www.ecfr.gov/cgi-bin/text-idx?SID=4d37d443ff7da5de96902e4d1b349217&mc=true&node=pt28.1.36&rgn=div5>

37 See the poll results presented and linked to in the October 14, 2014 article "Poll: 70% of Americans Oppose Racial Profiling by the Police": <https://reason.com/poll/2014/10/14/poll-70-of-americans-oppose-racial-profi>

38 See the US Constitution's "equal protection clause" in the 1868 Amendment XIV, Section 1: https://www.senate.gov/civics/constitution_item/constitution.htm



Our community is certainly concerned about fraud and misuse of the laws, since we do not want our rights abused or our animals attacked. However, preserving access for people with disabilities is clearly the larger priority. Yes, it's the ACA's prime directive, but access is also prioritized by 82% of our community. Almost 2 out of 3 survey-takers went to the trouble to mention concerns about burdens to access in their open-ended responses.

We are aware of no evidence the current burden-stacking approach of preventing fraud has a significant positive impact. There is much evidence of its negative impact.

With a tight turnaround in 2016,³⁹ we conducted a survey and let DOT know about the severe impacts of the current regulations on the people with mental health-related disabilities singled out by the regulations. When 3 out of 4 of these people with disabilities stop or reduce their flying due to the burdens, the proof is in the pudding that the burdens are undue.

DOT officials may not understand or be able to empathize that many people with disabilities are economically disadvantaged, which makes the \$156.77 paperwork cost more significant. Parallel to this, many people with disabilities have more difficulty engaging in and recovering from what are everyday activities for others, which makes the 30.6 days to get in to see a doctor and 4.8 hours of personal time more of an impasse than they would be for others.

Given the ACA's prime directive, we are confused that DOT would create a system wherein people with disabilities are so burdened, with one class of them further stigmatized.⁴⁰ It seems the ACA is meant to *remove* burdens, not *add* them. We are flabbergasted that DOT writes of these burdens as if they would be bad for all other people with disabilities, but not

³⁹ DOT had Econometrica reach out to us on Wednesday, December 7, 2016 for data to feed into a regulatory impact analysis. We submitted our report on December 11th. Econometrica had written:

"[...]We're currently working to gather cost and benefit and other relevant data to be able to construct a regulatory impact analysis for an eventual proposed rulemaking by OST. Regarding the service animal provisions, [DOT officials] suggested we reach out to you to obtain information about the costs of third party documentation for service animals and/or emotional support animals. Do you have any data or other qualitative information on the costs of obtaining or maintaining third-party documentation for service animals and/or emotional support animals?"

"Would you be able to provide this information by Monday December 12th? Please let me know if you have any questions."

⁴⁰ It further confuses us that DOT does not seem to recognize that one of the most-agreed upon issues at the Reg Neg was not to treat psychiatric service animals any differently from other types of service animals. By the end, this was no longer up for debate, with the straw poll about the service animal definition instead focusing merely on whether to include cats as service animals. Documents from the fifth meeting evidence this through a lack of pointed concern on either side over the issue, since participants felt it had already been settled. <https://www.transportation.gov/office-general-counsel/negotiated-regulations/5th-meeting-sept-21-23>



for the people with disabilities who currently suffer under them.⁴¹

What we find most bizarre is that we provided clear evidence of the unacceptable burdens *already* in play, yet DOT presently considers whether to permanently add more such burdens.⁴² Respectfully, from the outside it looks like DOT's single-minded goal in this area is to chase total victory in a misguided crusade against an anecdotal "fraudster" enemy, without regard for how much this burden-stacks people with disabilities.

DOT can no longer pretend the existing burdens and the new access barriers are due and just burdens. The present survey simply reinforces the manner in which these systems *eliminate* and reduce access for people with disabilities.

Two-thirds of our community members don't think their veterinarians would be willing to sign the kind of form airlines like United would like to have,⁴³

41 We would expect DOT to be experiencing a great deal of cognitive dissonance around this disparity. On page 12 of DOT's May 16, 2018 "Interim Statement of Enforcement Priorities Regarding Service Animals", DOT says "At present, the Enforcement Office is not aware of any airline requesting information from ESA or PSA users that would make travel with those animals unduly burdensome[...]". Just earlier, on page 9, DOT had made the curious observation that users of disability-mitigating animals *other than those for mental health-related disabilities* might be harmed if subjected to the same requirements as PSA and ESA users. On page 11, DOT then echoes the sentiment that extra burdens are okay, but only for those with mental health-related disabilities:

"Thus, under existing rules, carriers may not otherwise require advance notice for passengers traveling with service animals (e.g., seeing eye dogs) other than ESAs or PSAs unless the flight segment is 8 hours or more. Requiring advance notice for service animals outside of these specific circumstances violates the Department's regulation and may significantly harm passengers with disabilities as it prevents them from making last minute travel plans that may be necessary for work or family emergencies." (9)

"As described previously, certain carriers have indicated that they need veterinary forms or behavioral attestations to determine whether a service animal, particularly a PSA and/or an ESA poses a direct threat. At the same time, we understand the disability advocates' view that these policies violate the Department's disability regulation because they impose new requirements on passengers with disabilities.

"The Enforcement Office does not intend to use its limited resources to pursue enforcement action against airlines for requiring proof of a service animal's vaccination, training, or behavior so long as the documentation is not required for passengers seeking to travel with a service animal that is not an ESA or PSA." (11)

<https://www.regulations.gov/document?D=DOT-OST-2018-0067-0001>

42 See DOT's ANPRM: <https://www.regulations.gov/document?D=DOT-OST-2018-0068-0001>

43 From United's February 1, 2018 release about their planned policy:

"The customer must also provide a health and vaccination form signed by the animal's veterinarian. The veterinarian must also affirm that there is no reason to believe that the animal will pose a direct threat to the health and safety of others on the aircraft or cause a significant disruption in service."

<https://hub.united.com/united-emotional-support-animal-policy-2530539164.html>



and they seem to be right.⁴⁴ If service animal users had to get veterinary records or a health certificate before flying, they estimate it would cost \$115, take 8 days total, and take 6 hours of personal time.⁴⁵ Such burdens would radiate and multiply across hundreds of thousands of flyings by service animal- and ESA-using people with disabilities each year.⁴⁶

While the population-level cost is disturbing, we remind DOT that for most people with disabilities, these burdens are enormous on the individual level. In our community, 79% of people are at least moderately discouraged from flying by being required to provide one piece of third-party documentation, with 22% being totally discouraged.⁴⁷ This data is reinforced by our 2016 survey, which found that 76% fly less or not at all due to the contemporary burdens.⁴⁸

In the present survey, if individuals have to provide *two* pieces of third-party documentation, 88% are at least moderately discouraged and 55% are *totally* discouraged from flying. **We believe this means that over half of our population will not fly with such a system as DOT is considering—a system that is supposed to guarantee access for people with disabilities.**

§3.c. "Basic Economy" *de facto* discriminates, avoidably

The initial impetus for this survey was our interaction with DOT about

44 See the March 2, 2018 release from the American Veterinary Medical Association (AVMA), "AVMA, United Airlines reach agreement on veterinary health form"—and the comments from veterinarians attached thereto: "The AVMA, with support from AVMA PLIT, flew into action when United Airlines announced a new policy requiring a veterinary signature vouching for the health, behavior and training of psychiatric service and emotional support animals (ESA) flying with United passengers.

"The AVMA reviewed United's Veterinary Health Form, which the airline said would take effect March 1, and recognized that the information it requested might not position United to make good decisions that would appropriately support the health and welfare of their animal and human passengers. The statements on the form also created potential liability risks for veterinarians attesting to them."

https://atwork.avma.org/2018/03/02/avma-united-airlines-reach-agreement-on-veterinary-health-form/?utm_source=smartbrief&utm_medium=email&utm_campaign=smartbrief-assoc-news

45 See §5.a. for our data and analyses.

46 We are extrapolating based on data from airlines and our 2016 survey report calculations, which pertained only to disability-assisting animals for mental health-related disabilities: "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)." (2) <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-DOT-Info-Request.pdf>

47 The integer scale in our survey is from 1 to 5, with only 1 and 5 explicitly defined as "not at all discouraged" and "totally discouraged", respectively, in response to "How much would it discourage you from flying if[...]". We consider a rating of 3 to be "moderately discouraged". The 3, 4, and 5 responses for the seventh question constitute 21.1%, 36%, and 21.8% of the answers, totaling 78.9%. Similarly for the eighth question, the numbers are 7.9%, 24.8%, and 55.2%, totaling 87.9%. See §5.a.

48 <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-DOT-Info-Request.pdf>



American's new "Basic Economy" fare.⁴⁹ Other airlines, such as Delta⁵⁰ and United⁵¹, have also implemented this cheaper type of fare. Basic Economy has various restrictions, such as having to board last, not having access to the overhead luggage space, and not being able to choose one's own seat without a fee.

Each of the restrictions mentioned can run somewhat contrary to ACAA regulations that accommodate service animal users.⁵² Since all fare types

49 <https://www.aa.com/i18n/travel-info/experience/seats/basic-economy.jsp>

50 https://www.delta.com/content/www/en_US/traveling-with-us/onboard-experience/basic-economy.html

51 <https://www.united.com/web/en-US/content/travel/in-flight/basic-economy.aspx>

52 As we put it to DOT on August 7, 2017, the boarding and bulkhead issues are more straightforward.

The issue of whether or how to accommodate service animal users in light of the overhead space restriction is a little more complicated. These tickets do not (normally) allow a passenger to use the overhead bin space. Yet the person would have the under-seat footspace for carryon luggage in non-bulkhead seats. (Service animal users are historically supposed to have the option of bulkhead or non-bulkhead seats; see 14 CFR §382.81(c), while (d) is also conceptually relevant to allowing extra space as needed, other than a whole extra seat: https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_181)

The question is whether a total overhead storage prohibition for this ticket would apply to a service dog user whose dog occupies the footspace, since the dog is a disability-mitigation device. Would that person be entitled to any overhead luggage space to substitute for the footspace the dog occupies?

Presumably, assistive devices and associated disability accommodations in a bag would be exempt from the fare restrictions and be allowed in the overhead, per 2009 DOT guidance, Q&A #44 under §382.121: https://www.transportation.gov/sites/dot.gov/files/docs/FAQ_5_13_09_1.pdf So the question is about carry-on luggage that is not exclusively disability-related.

American, for example, puts the carry-on allowance for Basic Economy roughly in terms of the footspace measurements. Perhaps if the overhead space for service animal users were limited to the footspace equivalent, that would be a reasonable accommodation. This would give Basic Economy service animal users the equivalent carry-on luggage space in the same class of service as non-service animal users. The restriction to a footspace-equivalent overhead space would still be a class-of-service restriction that passengers with normal tickets do not have. (The regulation regarding class of service is 14 CFR §382.87(f): https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_187)

This discussion is theoretical, but one of our authors has found the enforcement to be more passively practical. An airline representative told him not to worry about the Basic Economy overhead restriction, since his party would be pre-boarding and would have plenty of space. The implication was that the airline merely does not guarantee Basic Economy ticket-holders overhead space because they are (normally) boarding last, rather than the airline actively taking any measures to prevent such passengers from using the luggage space if it's available. This laissez-faire approach is an elegant solution to what may be a merely theoretical problem, but airlines still must make it clear that there is a possible exception for people with disability-related needs so they don't opt out based on a misunderstanding.

Additional regulations relevant to making a study of this might include 14 CFR:

§382.31 — prohibits disability-related charges, yet allows charges regardless if more than one *seat* is occupied https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_187



are supposed to be open to people with disabilities,⁵³ we felt that airlines should clarify any disability-related exceptions to their basic economy policies. Otherwise, the lack of clarity about whether their needs will be met has the practical effect of keeping people with disabilities from accessing the same spectrum of fares available to others, constituting de facto discrimination.⁵⁴

None of the airlines' Basic Economy pages we footnoted currently mention disability-related exceptions. We urged DOT to provide guidance or regulations to airlines to compel clarification, since we presume a simple asterisk and explanation about specific disability-related policy exceptions would adequately address the problem of de facto discrimination.⁵⁵ The April 4th, 2018 DOT response in our email exchange was (in part) as follows:

With respect to whether the Department will be issuing guidance on basic economy seating programs, we traditionally decide whether or not to issue a guidance document when we receive a significant number of complaints about an issue or we have received data indicating that there is significant concern in the disability community about an airline policy or practice.

Since the initial problem is a simple one of ignorance-based fare avoidance, this is not the sort of issue we would expect to inspire formal complaints. Consequently, we're providing the data. A full 64% our

382 131

§382.93—passengers with disabilities must be allowed to pre-board if extra time is needed

[https://www.ecfr.gov/cgi-bin/retrieveECFR?](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_193)

[gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_193)

382 193

§382.121(b)—airlines can't count assistive devices as carry-on [https://www.ecfr.gov/cgi-](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_1121)

[bin/retrieveECFR?](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_1121)

[gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_1121)

382 1121

53 See 14 CFR §382.11(a)(1) and (3): [https://www.ecfr.gov/cgi-bin/retrieveECFR?](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_111)

[gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_111)

382 111

54 Even experts on the regulations such as us have either hesitated or refrained from saving money on a Basic Economy fare. However, this is mostly due to a worry that the airline employees would not be versed in the regulatory exceptions and would use the Basic Economy policies as justification not to accommodate our disability-related needs. See §3.e.

55 We would expect the asterisk (or any functionally equivalent symbol) to appear next to any policy provision for *any* fare type, regardless of its name, where the policy provision may conflict with disability-related regulations or DOT guidance. At the minimum, the airline needs to note that there are disability-related exceptions. Either in the same location, or (if there's a space issue on a physical document) in another accessible document clearly specified in the original location, airlines should clarify exactly the manner in which they would make a disability-related exception (e.g., "A service animal user may choose to sit in either a bulkhead section or a non-bulkhead section without an extra fee; reserving a particular seat within either section may incur a fee.").



community indicated they would be *totally* discouraged from purchasing Basic Economy fares due to their disability-related needs, while 91% were at least moderately discouraged. This data from 919 responses clearly indicates DOT needs to take action if this de facto discrimination is to stop.

We are reminded by this that access for people with disabilities isn't only about whether those who surmount the barriers get along okay. We must also consider how people are pushed to opt out altogether because the barriers are too much for them. Barriers include the perceptions and confusion that policies and their presentation create in reasonable people.

Fortunately, a ready solution is at hand and DOT has the power to put it into effect.

§3.d. *Training+ for safety and crate-free access*

Almost 9 out of 10 people in our community are concerned about another animal harming or interfering with their disability-mitigating animal. Further, 95% recognize that the unusual crowding and stress of the flying environment means animals should be transported in pet carriers if they haven't been both trained and accustomed to similar environments.^{56,57} This was the second-most-common type of sentiment in the open-ended comments, in 38% of the responses.⁵⁸

Our community is obviously very concerned about whether other animals are safe to be around. We find this comes mainly from two sources: negative experiences with misbehaving animals, and the risk of such misbehavior to their own animal.

To understand this worry about the risk to one's own animal, it helps to recognize that basic risk analysis involves two major components: likelihood and severity. It is difficult to say how likely a bad encounter is when flying, but it is easy enough to understand the severities of the possible outcomes.

If a service animal is distracted from its job by an unruly animal, the service

⁵⁶ See questions 11 and 10 in §5.a.

⁵⁷ We believe it's not generally reasonable to expect ESAs to be public access trained or to have developed the appropriate psychological shock absorbers it typically takes service dogs 1–3 years of focused training to cultivate. Yet we recognize and value the needs of ESA users who are unable, unwilling, or simply not needing to train their ESAs as service animals. The best compromise we've produced regarding ESA flight access is that they be transported and contained in a pet carrier by default, but able to come out of the pet carrier (tethered) specifically for disability mitigation. See §3 of our 2016 compromise comment: <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-Pre-NPRM-Comment.pdf>

⁵⁸ See "Behavior & training" in §5.b.



animal may not be able to perform its service, which can endanger the person's health or safety.⁵⁹ If a service animal is actually attacked, of course it may, tragically, be killed. More likely, an attack would result in injury to either the animal's body or training, creating a temporary or permanent setback for that team. This can deprive the person of their independence or functionality for an indefinite period of time—even years—all based on one incident.

This is why many service animal users dread being around stressed, untrained animals. The likelihood of an incident may only be 1%, for example, but if it's that unlucky 1 out of 100, the severity could be devastating.

Even if animals are well-trained *per pet standards* and in familiar environments, most are unaccustomed to the hustle and bustle of an airport and the sardine-can stay of a modern flight. In a strange, stressful experience, animals without extensive psychological shock absorbers from purposeful training are not as reliably behaved as their owners might expect.

These considerations lead us to agree with our community's wisdom. For crate-free access in the airplane cabin, animals should be both trained and accustomed to flight-like environments—as we expect service animals to be.⁶⁰ Service animal users should not have to be so worried about harm to or interference with their lifelines.

§3.e. *Ways to improve confidence in airlines*

Only about 1 out of 4 community members are at least moderately confident that airline employees interpret disability laws correctly,⁶¹ with 4 out of 9 people giving the most extreme response on the other end—that they are not at all confident. On a scale of 1 to 5, with 1 being "not at all confident", the average rating is a paltry 1.9.⁶² Trust-related issues were the third-most-common type of concern in the open-ended comments, in 19% of the responses.⁶³

59 As an everyday example, see "Hestia missed an alert" from May 17, 2018 in the blog "Dr. V's Service Dog Adventures": <http://www.doctorv.xyz/2018/05/17/hestia-missed-an-alert/>

60 Notably, these safety points can be considered somewhat independently of disability status. These arguments do not just apply to ESAs, but also to pets, wherever pets are allowed in the cabin (or otherwise at the airport). In our experience, most service animal users would much rather be around a well-behaved "fake" service animal (or other pet) than a poorly behaved "legitimate" service animal.

61 The integer rating scale is 1–5, where 1 is "not at all confident" and 5 is "totally confident". We interpret a rating of 3 as "moderately confident". The 3, 4, and 5 ratings are 18.1%, 6.4%, and 2.1% of the total ratings, which sum to 26.6% (approximately 1 out of 4).

62 See question 12 in §5.a.

63 See §5.b.



There are three main parties to this predicament: people with disabilities, airlines, and DOT. We will suggest options for what each might do to improve such negative perceptions.

People with disabilities: Some individuals with disabilities could be better educated about the laws. It is not uncommon to hear service animal users complain that the airlines are not following the ADA. They simply do not realize that Title III of the ADA⁶⁴ and DOJ's Title III ADA regulations⁶⁵—those laws most familiar—do not apply directly to air transportation.

In addition to individuals furthering their educational journeys, we as community and organizational leaders can continue to clarify the laws where and how we reasonably can. We and our peers can also keep consulting with airlines who would like expert or everyday user feedback on plans for new trainings or materials.

Airlines: While it's true the abysmal confidence numbers point to the need for more training, we feel as if that call has reverberated to the point of becoming background noise. We will move on to other pieces of the puzzle that are needed if our community's trust is to be won in any measure.

The first window into an alternative approach became clearer to us at the Reg Neg. We were told then that there is high turnover among airport staff due to relatively low pay. High turnover leads to a greater need for recruiting and fresh training, which costs airlines.

We do not claim to be business tycoons, but perhaps it would be better for the long haul to shift more of the airline budget into wages and benefits in hopes the recruiting and training costs would decrease. Experienced employees are likely to be more knowledgeable in providing appropriate customer service to passengers with disability-related needs (and less likely to make costly mistakes).

A bone our community has to pick with airlines is that with the current system, employees tend to be focused more on the paperwork associated with an animal, but not on enforcing behavioral policies.⁶⁶ This reluctance to

64 See 42 USC §12181(10), which carves out aircraft from "specified public transportation" and §12184, which details only the nondiscrimination provisions for "specified public transportation". Historically, it seems the reason for this exception is that the Air Carrier Access Act came before the Americans with Disabilities Act. <https://www.gpo.gov/fdsys/pkg/USCODE-2010-title42/html/USCODE-2010-title42-chap126-subchapIII.htm>

65 See 28 CFR §36.102(a)(1) for the regulations' application to public accommodations and commercial facilities, and §36.104, which gives definitions clarifying that aircraft are not considered public accommodations or commercial facilities. <https://www.ecfr.gov/cgi-bin/text-idx?SID=512c209a1a75ff3d9cad24d8408edbed&mc=true&node=pt28.1.36&rgn=div5>

66 Hence PSDP's call of "behavior, not belongings".



engage early when there's misbehavior can lead to difficulties for everyone, as mentioned above in §3.d.

Our friendly colleagues at an airline had an idea to develop what we think of as a behavioral flowchart for team assessment and response. A "team" here is an animal and (hopefully) its handler/user. The idea is to have a straightforward, practical guide to assist employees and relieve *some* of the pressure of making subjective judgments that impact customers' journeys. The "Behavior standard guidance" in our 2016 compromise comment may serve as a useful basis for such a flowchart.⁶⁷

Beyond this, the corporate culture needs to be one in which employees are empowered when they use their best judgment and training to enforce behavior rules. Our impression from the Reg Neg is that employees are afraid to call out bad behavior because even if they are in the right, they do not feel like the airline will support them. In fact, they even fear getting reprimanded if the customer complains.

Without the right training, employee longevity, resources, and corporate culture/support, our community will continue to lack confidence that airline employees will create a safe environment and treat people with disabilities appropriately.

DOT: DOT sets the rules by which airlines and our community are supposed to play. At the moment, it seems to our community that there are complex, discriminatory, confusing laws that are difficult to implement or impotent at their purpose. The enforcement priorities invite a patchwork of airlines tailoring their own unique burdens. The system's hard divergence from the most commonly applicable service animal law fosters misunderstanding.

When possible, ACAA rules need to be straightforward, consistent, easy to implement, complete enough to minimize airline variance of burdens, and not starkly different from the rules that apply in almost every other business context.

DOT could improve things by creating a system that relies less on individual employees having to subjectively evaluate on the spot whether someone understands their rights and responsibilities and deserves disability-related animal accommodations. We also need a system that does not assume customers are experts on disability rights laws—in fact, access systems should assume the least amount of knowledge reasonable,

⁶⁷ See Appendix E: <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-Pre-NPRM-Comment.pdf>



so they work for everyone.

Customer interfaces like an accommodation request form⁶⁸ should not involve a large chunk of one-size-fits-all legalese that no one will read, such as a single "attestation". Instead, they should leverage basic contemporary technology to provide an interactive, stepwise sorting procedure with response-sensitive content customers are likely to grasp, such as in a decision tree.⁶⁹

The point of the ACAA is to enable people with disabilities access to air travel, but the effect of the current regulatory approach is to severely restrict disability-mitigating-animal users from flying. Since the current system has clearly not worked, *more of the same* is a bad idea (such as more third-party documentation).

We need a new approach paradigm. The approach we've described is to assume prospective passengers are *ignorant* of the expectations and their responsibilities, rather than treating them as if they have malicious intent until proven otherwise. In designing disability rights laws, we hope DOT will join us in our answer to this question: Is it right to presume people with disabilities are innocently ignorant, or knowingly guilty?

§4. Survey methodology

In this section, we relay the details of our survey distribution and the survey content (the latter through both text and image).

§4.a. Distribution

Between April 23rd and May 8th, 2018 (15 days), we surveyed individuals who identify as service animal users or ESA users who may fly into, out of, or within the United States. We advertised the survey via social media, websites, email lists, and directly via email to approximately 46 sets of individuals associated with a diversity of disability-related groups, whom we encouraged to distribute our survey advertisement by including email and social media messages to copy and paste.

68 "ARF", for those paying attention. See 14 CFR §382.43(d): https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=081e6fdb88efba024ce66cc2df66709&mc=true&n=pt14.4.382&r=PART&ty=HTML#se14.4.382_143

DOT is currently accepting feedback on this regulation: <https://www.regulations.gov/document?D=DOT-OST-2011-0177-0116>

69 See §§4–6 in our 2016 compromise comment: <https://www.psychdogpartners.org/wp-content/uploads/2016/12/USAUSA-ACAA-SA-Pre-NPRM-Comment.pdf>



§4.b. *Survey page content, text*

The survey was created through Google Forms⁷⁰ and embedded in a webpage on Psychiatric Service Dog Partners' website.⁷¹ In §4.c., we provide a screenshot image of the page from when the survey was open. Below, we reproduce the content of the survey page in text, including the introductory survey information and the full survey text itself.

Flight access survey

[survey advertisement graphic]

[Image description: Graphic with text. Black and white picture of service dog teams looking at the text in the middle, USAUSA paw-button logo in bottom right. Text: Do you use a SERVICE ANIMAL or ESA? Don't just stand there—take the flight access survey! DOT needs to know how updates would impact you.]

What, how, & when: We need you to help the community by taking this flight access survey and/or by sharing it. Act now—**Tuesday, May 8th, 2018** is the closing date for the survey.

Who: This survey is for you if you use an animal to assist with your disability and you may fly into, out of, or within the United States. This includes service animal users (including guide dog users, psychiatric service dog users, etc.) and emotional support animal (ESA) users.

Why: The US Department of Transportation (DOT) requested information from our community to better understand the impacts of various air travel considerations. DOT will be able to use this data to shape regulation updates, issue guidance, and keep airline policies in check.

Background: Unlike the Americans with Disabilities Act (ADA), the Air Carrier Access Act (ACAA) is the disability rights law that covers US air travel for people with disabilities. DOT writes and enforces the regulations that implement the ACAA. In a 2016 survey through USAUSA (United Service Animal Users, Supporters, and Advocates), we asked people about the cost and time taken to get medical letters

⁷⁰ <https://docs.google.com/forms/u/0/>

⁷¹ <https://www.psychdogpartners.org/usausa/flight-access-survey>



for themselves for flying, so we are not asking about that again here.

iPhone & iPad users: Use the direct survey link (immediately below) rather than the survey on this page if you're running one of the latest operating systems (iOS 10 or 11). Otherwise your device will annoyingly jump to the bottom after you give an answer, skipping the rest of the dozen or so questions.

<https://goo.gl/forms/uWb6rrrmuBCw6lLr2>

[The embedded survey form content follows. The prompts are not numbered on the form, but we number them here for convenient reference.]

Flying with a disability-assisting animal

There are about a dozen questions in this survey, all on this page.

1. Would it be acceptable for airlines to put up more barriers for people with one type of disability vs. another? An example would be making blind individuals get a doctor's letter certifying they are blind, while not making deaf individuals get a letter certifying they are deaf for the same accommodation.

Yes
No

2. When prioritizing, should disability rights laws focus on protecting access for people with disabilities more than reducing the number of people misusing the laws?

Yes
No

3. Some airlines have been considering requiring you to provide documentation from a veterinarian to allow you to travel. If you had to get an up-to-date veterinary record or veterinary health certificate for your flight, how much money do you estimate it would cost you? You can give an average, if you like. Give only a *single number* in US dollars—include the cost of any travel, appointment, and extra fees.



Your answer [open-ended answer space]

4. If you had to get an up-to-date veterinary record or veterinary health certificate, how many *days* do you estimate it would take between contacting your vet and having the paperwork in your hand? Give only a *single number*, not a range (you can estimate an average).

Your answer [open-ended answer space]

5. If you had to get an up-to-date veterinary record or veterinary health certificate, how many *hours* of your personal time do you estimate it would take? In only a *single number*, include any travel time, waiting room time, and appointment time.

Your answer [open-ended answer space]

6. If you had to guess, do you think your veterinarian would be willing to sign their name to a statement predicting whether an animal would behave in a flying environment?

Yes
No

7. "Third-party" paperwork is special documentation you get from someone else, like a doctor or veterinarian, and often requires an extra appointment and/or fee. How much would it discourage you from flying if you had to get one type of third-party paperwork and give it to the airline ahead of time?

not at all discouraged 1 2 3 4 5 totally discouraged
[integer rating]

8. How much would it discourage you from flying if you had to get *two different types* of third-party paperwork and give them to the airline ahead of time? For example, both a recent doctor's letter and a recent veterinary record or health certificate.

not at all discouraged 1 2 3 4 5 totally discouraged
[integer rating]

9. Some airlines have begun advertising cheaper "basic economy" fares, where passengers are supposed to board last, not have access to the overhead luggage space, and not



choose their own seat. How much would these policies discourage you from buying a basic economy ticket because of your disability- or animal-related needs?

not at all discouraged 1 2 3 4 5 totally discouraged
[integer rating]

10. A person might think their animal is "trained", but the animal might not be prepared to handle crowded, stressful flight environments outside of a pet carrier or crate. For crate-free access when flying, should animals be both *trained* and *accustomed* to behaving in similarly stressful public places?

Yes
No

11. Are you concerned about untrained or stressed animals interfering with or harming your animal if you fly?

Yes
No

12. How confident are you that airline staff members do or will interpret disability laws and policies accurately and appropriately?

not at all confident 1 2 3 4 5 totally confident
[integer rating]

13. Please share any other remarks that might help DOT understand the costs and burdens you might face because of ACAA regulations, DOT enforcement practices, airline policies, or airline practices.

Your answer [open-ended answer space]

§4.c. *Survey page content, image*

Below is an image of the survey webpage described above, split with the page's top on the left side and the bottom on the right.



Home » USAUSA » Flight access survey

Learn what PSPF does and doesn't do

Flight access survey

News



April 23, 2018 - It's super-important to let DOT know how you'd be affected by different flying rules. Take a share the USAUSA survey we've partnered to make. Closes Tuesday, May 8th.

Click to reveal more recent items on this page...



What, how, & when: We need you to help the community by taking this flight access survey and/or by sharing it. Act now - **Tuesday, May 8th, 2018** is the closing date for the survey.

Who: This survey is for you if you use an animal to assist with your disability and you may fly into, out of, or within the United States. This includes service animal users (including guide dog users, psychiatric service dog users, etc.) and emotional support animal (ESA) users.

Why: The US Department of Transportation (DOT) requested information from our community to better understand the impacts of various air travel considerations. DOT will be able to use this data to shape regulation updates, issue guidance, and keep airline policies in check.

Background: Unlike the Americans with Disabilities Act (ADA), the Air Carrier Access Act (ACAA) is the disability rights law that covers US air travel for people with disabilities. DOT enforces and enforces the regulations that implement the ACAA. In a 2018 survey through USAUSA (United Service Animal Users, Supporters, and Advocates), we asked people about the cost and time taken to get medical letters for themselves for flying, so we are not asking about that again here.

iPhone & iPad users: Use the direct survey link (immediately below) rather than the survey on this page if you're running one of the latest operating systems (iOS 10 or 11). Otherwise your device will annoyingly jump to the bottom after you give an answer, skipping the rest of the dozen or so questions.

<https://goo.gl/forms/Wb8rmu6Cef6L2Gf>

Flying with a disability-assisting animal

There are about a dozen questions in this survey, all on this page.

Would it be acceptable for airlines to put up more barriers for people with one type of disability vs. another?
An exception would be making blind individuals get a doctor's letter certifying they are blind, while not making deaf individuals get a letter certifying they are deaf for the same accommodation.

- Yes
 No

When prioritizing, should disability rights laws focus on protecting access for people with disabilities more than reducing the number of people misusing the laws?

- Yes
 No

Some airlines have been considering requiring you to provide documentation from a veterinarian to allow you to travel. If you had to get an up-to-date veterinary record or veterinary health certificate for your flight, how much money do you estimate it would cost you?
You can give an average, if you like. Give only a "single number" in US dollars - include the cost of any travel, appointments, and extra fees.

Your answer

If you had to get an up-to-date veterinary record or veterinary health certificate, how many "days" do you estimate it would take between contacting your vet and having the paperwork in your hand?
Give only a "single number", not a range (you can estimate an average).

Your answer

If you had to get an up-to-date veterinary record or veterinary health certificate, how many "hours" of your personal time do you estimate it would take?
In only a "single number", include any travel time, waiting room time, and appointment time.

Your answer

If you had to guess, do you think your veterinarian would be willing to sign their name to a statement predicting whether an animal would behave in a flying environment?

- Yes
 No

"Third-party" paperwork is special documentation you get from someone else, like a doctor or veterinarian, and often requires an extra appointment and/or fee. How much would it discourage you from flying if you had to get one type of third-party paperwork and give it to the airline ahead of time?

1 2 3 4 5
not at all discouraged totally discouraged

How much would it discourage you from flying if you had to get "two different types" of third-party paperwork and give them to the airline ahead of time?

For example, both a recent doctor's letter and a recent veterinary record or health certificate.
1 2 3 4 5
not at all discouraged totally discouraged

Some airlines have begun advertising cheaper "basic economy" fares, where passengers are supposed to board last, not have access to the overhead luggage space, and not choose their own seat. How much would these policies discourage you from buying a basic economy ticket because of your disability- or animal-related needs?

1 2 3 4 5
not at all discouraged totally discouraged

A person might think their animal is "trained", but the animal might not be prepared to handle crowded, stressful flight environments outside of a pet carrier or crate. For crate-free access when flying, should animals be both "trained" and "accustomed" to behaving in similarly stressful public places?

- Yes
 No

Are you concerned about untrained or stressed animals interfering with or harming your animal if you fly?

- Yes
 No

How confident are you that airline staff members do or will interpret disability laws and policies accurately and appropriately?

1 2 3 4 5
not at all confident totally confident

Please share any other remarks that might help DOT understand the costs and burdens you might face because of ACAA regulations, DOT enforcement practices, airline policies, or airline practices.

Your answer

SUBMIT

Never submit passwords through Google Forms.

This content is neither created nor endorsed by Google. Report Abuse - Terms of Service - Additional Terms

Google Forms



§5. *Data and analysis*

In this final section of our survey report, we (a.) detail, analyze, and graphically present the quantitative responses, (b.) give a quantitative analysis of the qualitative responses to the final survey prompt, and (c.) reproduce that final prompt's 393 qualitative responses. At DOT's request, we are happy to set up direct access to the copious raw data for all survey prompts separately from this report.⁷²

§5.a. *Quantitative analysis of quantitative responses*

The survey received 926 responses. We performed basic analyses on quantitative responses, such as median and mean determinations, where appropriate. Further, for quantitative questions with an open-ended response field, we graphed answer sets within numerical ranges based on what appeared to best display the differences among the "natural" groupings. Our novice background in statistics makes us confident the results are transparent and no advanced analysis of statistical significance is worthwhile for our purposes.

Below we provide the data under each of the twelve quantitative questions. We note but filter out such responses as non-numerical answers to numerical questions.⁷³

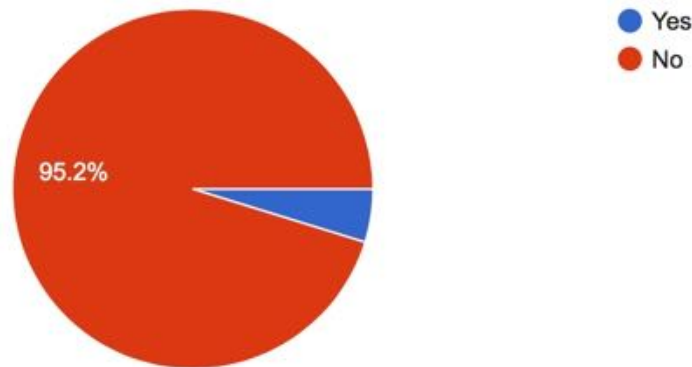
1. Would it be acceptable for airlines to put up more barriers for people with one type of disability vs. another?

922 responses

4.8% Yes (44), 95.2% No (878); *graphically represented in a pie chart below*

⁷² We are also open to sharing access to the raw data with interested researchers for further analysis.

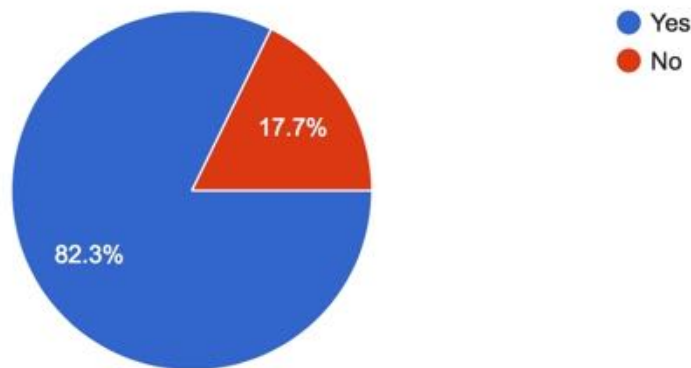
⁷³ Any range given was interpreted as the average between the endpoints. Any single figure given as a "minimum" or "maximum", or as a number with "+" after it, or a number with a "<" or ">" before it is interpreted simply as the number given (within reason). These interpretation methods were used across the open-ended quantitative questions.



2. When prioritizing, should disability rights laws focus on protecting access for people with disabilities, more than reducing the number of people misusing the laws?

913 responses

82.3% Yes (751), 17.7% No (162); *graphically represented in a pie chart below*



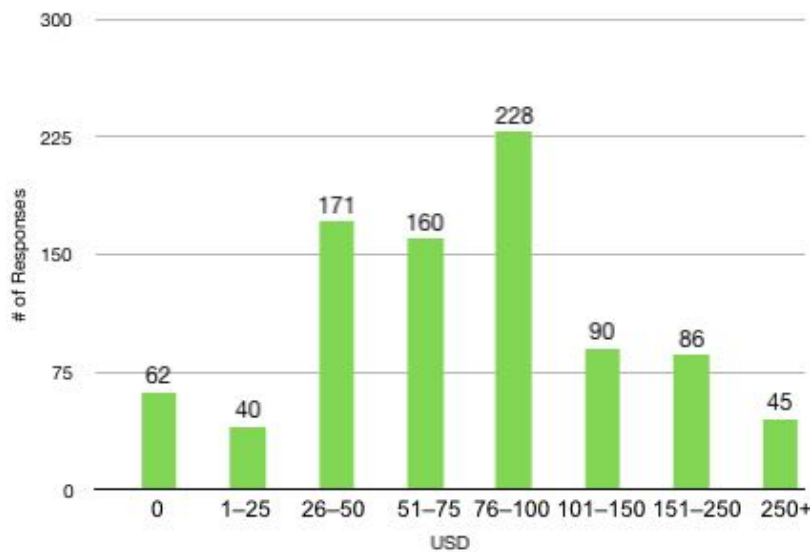
3. Some airlines have been considering requiring you to provide documentation from a veterinarian to allow you to travel. If you had to get an up-to-date veterinary record or veterinary health certificate for your flight, how much money do you estimate it would cost you?

899 responses, 882 amenable⁷⁴

⁷⁴ Seventeen responses, as follows, were not incorporated: "1005533", "?", "2-3 hours", "20057(:) 7", "3weeks", "60?252", "I do not know, but it would probably be a lot. I would suggest just bringing all



Mean: \$114.90. Median: \$80. Range: \$0–\$3,000.



The table below contains the information graphically represented in the bar graph above.

USD (\$)	0	1-25	26-50	51-75	76-100	101-150	151-250	250+
Response #	62	40	171	160	288	90	86	45

4. If you had to get an up-to-date veterinary record or veterinary health certificate, how many *days* do you estimate it would take between contacting your vet and having the paperwork in your hand?

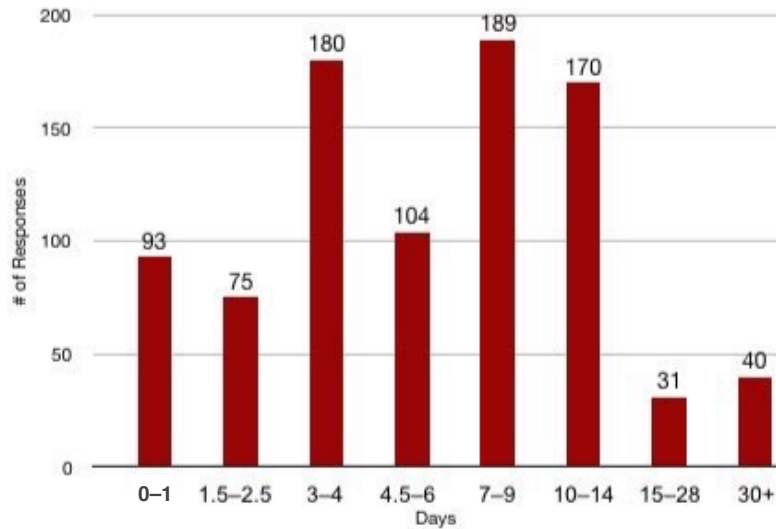
892 responses, 883 amenable⁷⁵

Mean: 8.3 days. Median: 5 days. Range: 0–352 days.⁷⁶

current records proving they have all the shots they need ", "I don't know or care--I'd pay the money to do it. Rather than a legit service dog be bit by a fake and contract some nasty disease.", "I don't know", " I have a full service dog. By federal law I should not have to do this ", "Not required by ADA", "Not sure", "Unknown" [x2], "unsure", "Unsure", "Very little if anything."

75 Nine responses, as follows, were not incorporated: "\$200.00", "Hundreds", "I do not know. Personally I keep all her shot records in one place and would not need to find them ", "I don't know ", "I have a full service dog. By federal law they should not have to present paperwork ", "Im not sure", "It should be an annual or bi-annual certification", "Unknown", "You cant ask people to quantify this. It varies by every individual vet office."

76 When responses were given in months, 30 days were used per month. When a respondent explicitly referred to a low number of hours, a small part of a day, or the same day, this was interpreted as 0.5 days. References to "business days" were ignored and the figure given was used without related interpretation.



The table below contains the information graphically represented in the bar graph above.

Days	0-1	1.5-2.5	3-4	4.5-6	7-9	10-14	15-28	30+
Response #	93	75	180	104	189	170	31	40

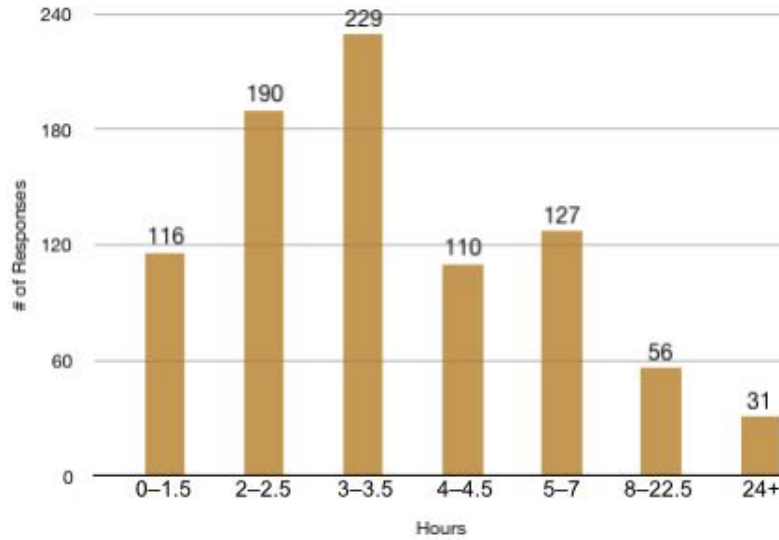
5. If you had to get an up-to-date veterinary record or veterinary health certificate, how many *hours* of your personal time do you estimate it would take?

865 responses, 859 amenable⁷⁷

Mean: 6.3 hours. Median: 3 hours. Range: 0-500 hours.⁷⁸

⁷⁷ Six responses, as follows, were not incorporated: "3300", "As I said before I personally have all my shot records in a folder and would not have to look for them", "could take all day", "I don't know", "No extra hours beyond regular appointments", "Q".

⁷⁸ While "3300" was removed as an outlier, we cannot remove all entries over 24 hours because some individuals living in rural areas must travel for veterinary care, while some with disabilities can only handle going out every so often and are unable to engage in other activities for days after an outing. Beyond removing the most extreme outlier as a possible mistake, we are not in a position to further scrutinize individuals' judgements about their relevant limitations.

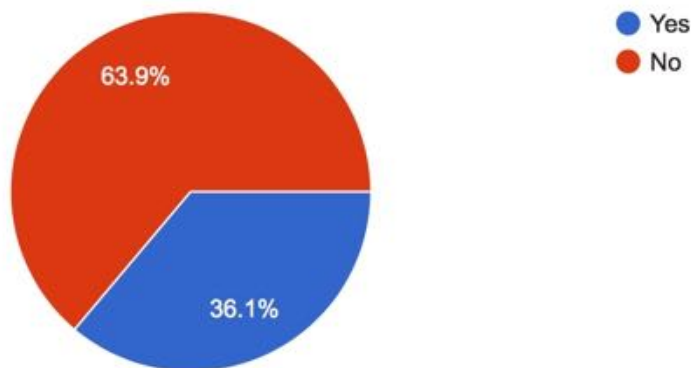


The table below contains the information graphically represented in the bar graph above.

Hours	0-1.5	2-2.5	3-3.5	4-4.5	5-7	8-22.5	24+
Response #	116	190	229	110	127	56	31

6. If you had to guess, do you think your veterinarian would be willing to sign their name to a statement predicting whether an animal would behave in a flying environment?

916 responses
63.9% Yes (585), 36.1% No (331); graphically represented in a pie chart below





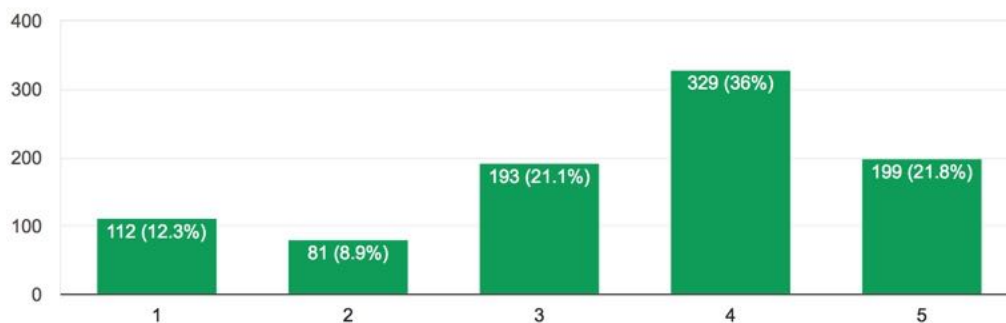
7. "Third-party" paperwork is special documentation you get from someone else, like a doctor or veterinarian, and often requires an extra appointment and/or fee. How much would it discourage you from flying if you had to get one type of third-party paperwork and give it to the airline ahead of time?

914 responses

1 = "not at all discouraged", 5 = "totally discouraged"

Mean: 3.5. Median: 4. Range: 1–5 (integers).

12.3% 1 (112), 8.9% 2 (81), 21.1% 3 (193), 36% 4 (329), 21.8% 5 (199); *graphically represented in a bar graph below*



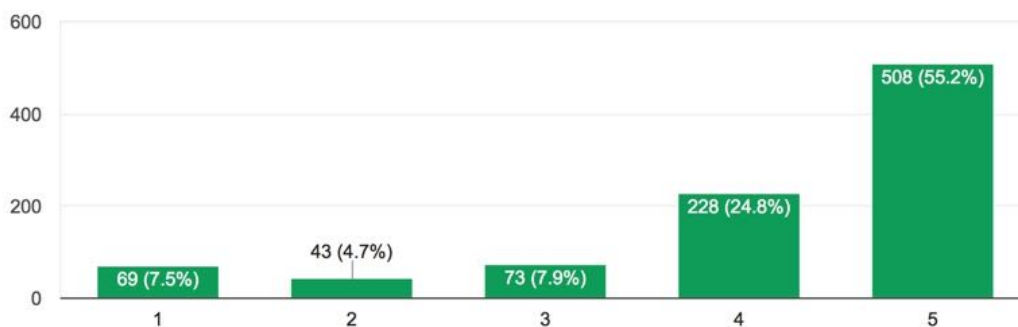
8. How much would it discourage you from flying if you had to get *two different types* of third-party paperwork and give them to the airline ahead of time?

921 responses

1 = "not at all discouraged", 5 = "totally discouraged"

Mean: 4.2. Median: 5. Range: 1–5 (integers).

7.5% 1 (69), 4.7% 2 (43), 7.9% 3 (73), 24.8% 4 (228), 55.2% 5 (508); *graphically represented in a bar graph below*





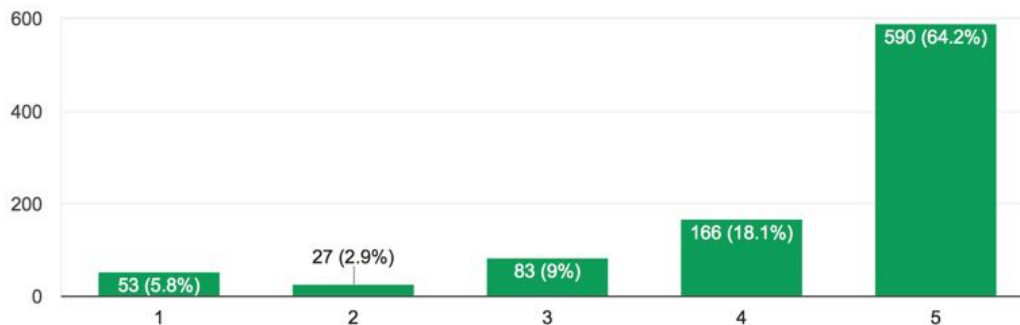
9. Some airlines have begun advertising cheaper "basic economy" fares, where passengers are supposed to board last, not have access to the overhead luggage space, and not choose their own seat. How much would these policies discourage you from buying a basic economy ticket because of your disability- or animal-related needs?

919 responses

1 = "not at all discouraged", 5 = "totally discouraged"

Mean: 4.3. Median: 5. Range: 1–5 (integers).

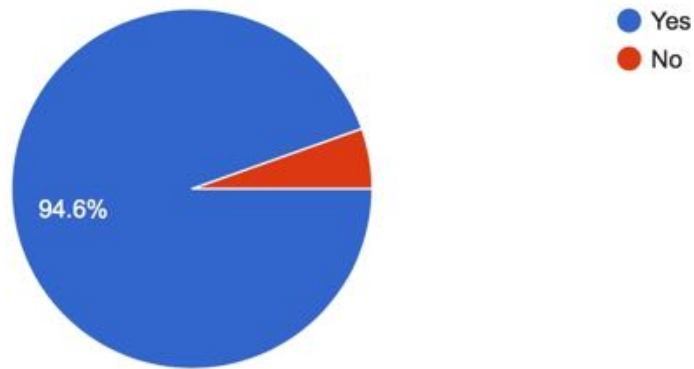
5.8% 1 (53), 2.9% 2 (27), 9% 3 (83), 18.1% 4 (166), 64.2% 5 (590); *graphically represented in a bar graph below*



10. A person might think their animal is "trained", but the animal might not be prepared to handle crowded, stressful flight environments outside of a pet carrier or crate. For crate-free access when flying, should animals be both *trained* and *accustomed* to behaving in similarly stressful public places?

921 responses

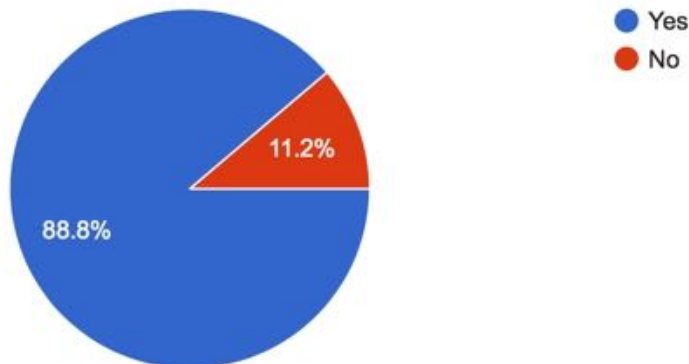
94.6% Yes (871), 5.4% No (50); *graphically represented in a pie chart below*



11. Are you concerned about untrained or stressed animals interfering with or harming your animal if you fly?

919 responses

88.8% Yes (816), 11.2% No (103); *graphically represented in a pie chart below*



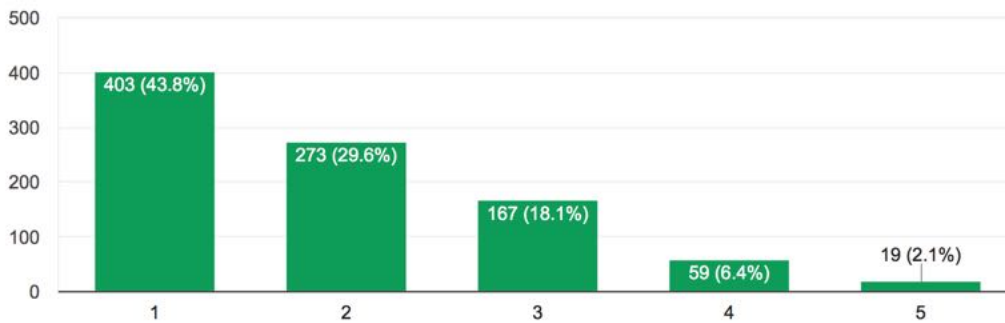
12. How confident are you that airline staff members do or will interpret disability laws and policies accurately and appropriately?

921 responses

1 = "not at all confident", 5 = "totally confident"

Mean: 1.9. Median: 2. Range: 1–5 (integers).

43.8% 1 (403), 29.6% 2 (273), 18.1% 3 (167), 6.4% 4 (59), 2.1% 5 (19); *graphically represented in a bar graph below*



§5.b. *Quantitative analysis of qualitative responses*

We designed the final (thirteenth) survey prompt to elicit qualitative responses of interest to DOT. The prompt was:

Please share any other remarks that might help DOT understand the costs and burdens you might face because of ACAA regulations, DOT enforcement practices, airline policies, or airline practices.

We quantitatively analyzed qualitative responses to the final survey prompt using the rubric detailed below. We produced the rubric by reviewing an initial subset of the responses, drafting a grouping of the common sentiments, testing that draft across further responses, and re-evaluating. Then we finalized the sentiment sets that fit together internally and represented the main idea clusters in the responses.

The analysis involved reviewing each comment and, for each set of sentiments in the rubric, recording in a spreadsheet whether that comment matched the set (in other words, contained at least one sentiment in the sentiment set). Since we have a miscellany category for this analysis, each response was matched with at least one sentiment set.⁷⁹ Responses could be (and were sometimes) matched with multiple sentiment sets, which means that the match percentages total exceeds 100%.

Rubric for sentiment sets

Name/description	Sentiments included
------------------	---------------------

⁷⁹ If a response contained, for example, two distinct sentiments and one fell under "Burdens" while the other did not fall under "Trust" or "Behavior & training", the response was counted under both the "Burdens" heading and the "Other" heading. If a response contained multiple distinct sentiments, each of which would only fall under the "Other" heading, "Other" was only counted once for the response.



<p>Burdens—includes the following, which respondents view as burdens to travel:</p>	<ul style="list-style-type: none"> • expenses • availability of doctors/veterinarians/other specialists • anxiety about rules and confrontation • separation of psychiatric service animals from other service animals
<p>Behavior & training—includes the following, important in connection with training requirements:⁸⁰</p>	<ul style="list-style-type: none"> • service/psychiatric service and support animals have been attacked by untrained animals • training plays a key role in behavior • good behavior is key to access • behavior should be a primary factor in access
<p>Trust—includes the following, relating to trust of airline staff, DOT staff, and other governmental agencies:</p>	<ul style="list-style-type: none"> • perceptions of poorly trained airline staff • perceptions of confusion of airline/airport staff about the laws and regulations • desire for additional training for all involved • anxiety around travel based on perceived lack of training from airline staff about regulations
<p>Other—includes topics that did not fall under any other category. Some topics include, but are not limited to:</p>	<ul style="list-style-type: none"> • mention of Basic Economy fare, noting that people may not take advantage of such discount seating due to concerns about their service animals and rights under the ACAA • suggestions of certification schemes, training protocols, or other licensing practices • comments about seating • comments about other auxiliary aids such as wheelchairs • suggestions to mirror other civil rights laws

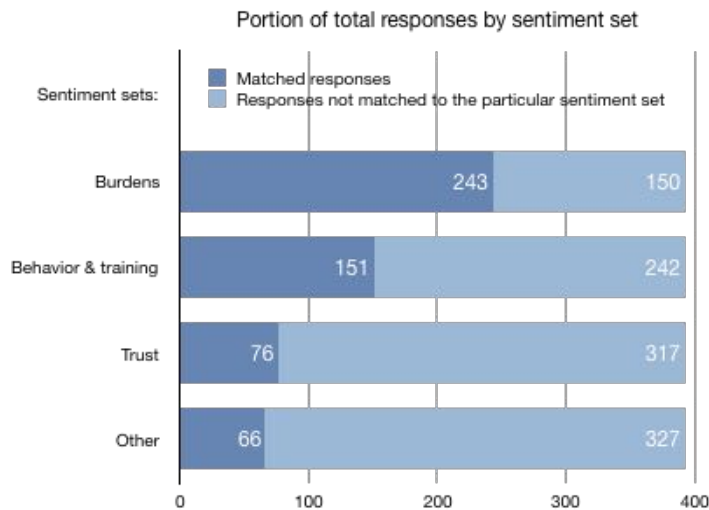
There were 393 responses to the final prompt, which we matched with our rubric's sentiment sets as follows.

Sentiment set	Matched responses	% of total responses	% of total matches (536)
Burdens	243	61.8%	45.3%
Behavior & training	151	38.4%	28.2%
Trust	76	19.3%	14.2%
Other	66	16.8%	12.3%

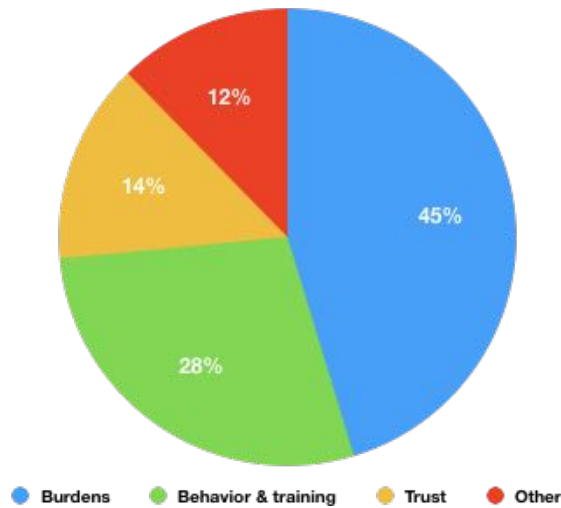
⁸⁰ We did not include suggestions for training or certification schemes in this category; see “Other”.



Some information in the table above is graphically represented in the horizontal stacked bar graph and pie chart below.



Percent of total matches by sentiment set



§5.c. Qualitative responses

This final part contains the information collected from individuals in response to the final, qualitative prompt in the survey. These comments clarify the great weight of the burdens the current and considered regulations inject in people's lives that can't be adequately conveyed by the numbers.

393 responses



[13.] Please share any other remarks that might help DOT understand the costs and burdens you might face because of ACAA regulations, DOT enforcement practices, airline policies, or airline practices.

1) I am disabled. That is a very big barrier for me when I need to travel. Any more added difficulties would be very discouraging.

2) I recently flew basic economy and I was SO NERVOUS about not being able to have anything in the overhead bin while managing a crowded seat with my service dog. I ended up leaving almost everything in checked luggage so that I would not have to deal with the issue. It was crowded and uncomfortable. And I was flying coast to coast.

I think airlines should allow a person with medical equipment to put something in the overhead bin, if their footspace is taken up by their service dogs. Lack of guidance from DOT about what would happen should a person with a disability fly basic economy, and how their disability would be accommodated (like boarding last with basic economy, but needing to pre-board with a service animal) scares people and makes them afraid to even try to purchase a basic economy seat. Most people with service dogs are afraid to fly basic economy because of the lack of guidance.

Regarding even more paperwork for flying, this is very difficult for me to handle. My therapist went through 4 drafts of a flying letter (I gave her what to write, she elaborated on her own) and told me she is not comfortable doing this again because as a therapist, she doesn't prescribe things. It took me a month of back and forth to get my therapist to write a letter.

Now imagine putting a vet certificate on top of all of that. It takes a week to get into the vet, and I don't think my vet would sign anything about my dog's behavior since they only see us once a year for checkups, and behavior in a vet office is usually quite different than behavior elsewhere. For me, my service dogs have always behaved better at the vet than elsewhere, but other peoples' service dogs might not be that lucky to only have good experiences.

Additionally, I cannot imagine a vet wanting to take on the



liability of saying an animal is well behaved enough to fly, given that they see us for so little time per year.

I have no choice but to travel for my occupation, but I am finding that more and more I am choosing very long train rides instead of flights due to all the requirements of flying with a service animal. I have already vowed that next time I need to travel to the West coast, I will take the train. The stressors of everyone asking for letters, knowing I have mental illness, generally looking down on me, and the dangers of ill behaved untrained dogs in the airport, are suffocating. The last time I flew, I saw 4 dogs in airports on the way out to the West Coast. Only one behaved as a SD should. On my way back to the East coast, I saw 7 dogs in the airports, and none of them were well behaved. The current system is wrong, and adding even more burdens is worse. I deserve the same basic rights as anyone else.

3) I believe that only trained service animals have the necessary skills to fly safely. Eliminating flight access for ESA's would solve the problem of untrained animals causing issues when flying.

4) My disability leaves me with limited energy and hours to accomplish my usual routine. Adding a vet visit, a medical visit and arranging to submit this information (which is not kept private) to the airline is onerous. Especially when airline staff across the board are working under differing education abt the current requirements.

Last time I flew, airline staff at one airport were efficient, had record of my pre-flight paperwork in the system and I was able to function. Staff at my destination airport (and thus my return airport) were NOT aware of my system paperwork, demanded hard copies of items I was told i would not need to carry, and ended up being fairly angry. This made my ability to function cognitively much less than usual.

5) Many people with service animals require specific seating and/or space to fit their animal and to avoid possible issues relating to disabilities, ie: having a panic attack from being assigned seats next to strangers

6) Jumping through hoops to have the same access as nondisabled people is unfair, unreasonable, and discriminatory



7) Before your animal flies for the first time you should be able to take your animal onto a plane so it can get used to the plane so it doesn't freak out when it flies and you should get something from the airlines saying you did that then you should be able to fly

8) Some flights are not plannable in advance, such as family emergency.

Who else has to go through this?

9) Will cost me several hundred dollars to get all required paperwork together. Please reconsider your decision.

10) If it is an ESA letters should be required. If it is a service dog - follow the ADA and respect our privacy. I have spent tons of money and time training for my multiple invisible disabilities. Letter from vet makes sense for any animal traveling.

11) I have a service dog. I'm very worried about esas. Those animals don't have training and are most likely go go after my dog or do something to give service dogs a bad rep. The general public doesn't understand the difference.

12) If current rights and laws are changed and it affects my ability to fly with my SD, then I will choose to never fly again. People with disabilities have a hard enough time dealing with access issues,

13) You need to crack down on ESAs. ESAs need to at least pass a K9 good citizens test before able to fly. Also airlines need to know a fake Service dog and have the confidence to remove it. Do not discriminate with those with those with psychiatric disabilities as psychiatric service dogs and ESAs are 100 times different.

14) Pat

15) My vet remarks how well trained etc. my service dog is every time we go in, yet I highly doubt he would take on the liability of saying my dog is safe to fly. Why should he?

It is not unusual for me to drive long distances when traveling. What am I supposed to do if there is a family emergence or I



have a health emergency and need to fly home immediately? A random vet is not going to sign the paper work and I don't have 48hrs. No able bodied person has to deal with or think about these issues, why is it okay to make disabled people's lives harder? How is that not discrimination?

Being disabled, we already deal with a lot of extra burdens and discrimination. We do not need legal discrimination on top of everything else. All the extra rules are going to do is make more money for the online groups that sell the letters and make life that much harder for those who are truly disabled.

I occasionally meet people who tell me they fly their dog as an ESA. When I mention needing to be disabled, they have no idea that is a requirement and argue it's not, that all they need is the letter. Set up a questionnaire where people have to answer they are disabled without prompting, and you will eliminate many of the people flying their pets as something else.

16) I have witnessed frequent misunderstandings (wrong information, lack of education, attitude) between airline staff and handlers, even the handlers were obviously deafblind. The idea of additional regulations (especially unnecessary or misapplied), cost and emotional/physical burden make me dread flying with my service animal. I would drive or just avoid flying- even if it meant missing a conference.

17) I have been thrown off Hawaiian airlines twice with a \$10,000 PTSD service dog due to his size and their willful discrimination. They punished me from flying on Hawaiian because I reported their misconduct to DOT twice. DOT did little to nothing to assist. As a Hawaii resident and nurse practitioner, this "back of the bus" discrimination has limited my ability to travel between islands for work and leisure.

18) It is my belief that untrained and misbehaving animals on a plane should be contained or restrained by crate and/or muzzle for the safety of those around them. I am happy for ESAs to not need a pet fee, but they are still pets and should be expected to behave like any other pet on a plane. Service dogs are trained and used to handling situations that would stress any average pet.

19) I have a full service dog that provides tasks to help my



disabilities. I have mobility issues. I should not have to provide paperwork just as someone with a wheelchair should not have to provide paperwork that there too I have a full service dog that provides tasks to help my disabilities. I have mobility issues. I should not have to provide paperwork just as someone with a wheelchair should not have to provide paperwork that they're legitimate. I do on the other hand have issues with people traveling with emotional support pets. Many of these pets are not trained and become a danger to my service dog. Although I understand disabilities very well, I am not in favor of traveling with emotional support pets as they often pose problems to legitimate service dogs.

20) I am concerned about fake documentation that anyone can purchase on the internet. there are no certificates stating a dog has been trained to accommodate my disability.

21) First the ACAAA needs to be inline with ADA. As well as recognize that an ESA is not the same as a psychiatric service dog and should not be lumped together with the same restrictions. Also that a veterinarian while highly educated is not qualified to determine the temperament of a dog. A certified dog trainer or animal behaviorist are the only ones qualified to make that determination. Requiring proof of training likely would be very expensive and cost prohibitive especially to those who owner train. Because ESAs are not required to have any training, I feel that is the biggest thing that could be changed. Requiring they have proof of basic obedience training, up to date on shots and not allowed to use flexi type leashes or long lines in order to prevent any incidents. As well as further recognizing that ESAs are not service dogs and should not be lumped together with psychiatric service dogs.

22) Current regulations are restrictive as gatekeepers already will harass assistance dog users thinking they have an ESA and further education is needed for all parties. I should not have to freak out every time I fly with my medical equipment.

23) Question 2 - tough call. I usually have her last check and shots handy so this one is not so bad, however, I have had airlines require their own form and that leads to time and cost.

24) Honestly a Canine good citizen test wouldn't hurt anyone from ESAs to SDs, if Airlines started requiring them there would



be less issues with ESAs (dog ESAs). With the whole vet deal, I mean Airlines are responsible for what they transport, if they transport a diseased animal it would blow up in the news and show terribly on them and their ethics. It's a catch 22 honestly. I do believe task trained psychiatric service dogs should not need a doctor's note, but ESAs always should. It's a tough world to work around in, we're all sick and it effects us all differently, please remember this kindly.

25) Any person with a disability will likely have adequate documentation. The trouble is doctors are worried about writing a letter that could make them liable. I think any pet owner who travels with any animal, wether they are an ESA animal or not, should have their vet records on hand and with the animal. It might perhaps be easier for the DOT to offer an ESA registration process with the DOT and not the airlines. The traveler should be able to provide the DOT with necessary pet documentation and disability documentation. Removing the airlines from the ESA predicament would help the disabled traveler retain their privacy and decrease the amount of paperwork the traveler would have to do if they use different airlines for traveling or if the airline requires them to resubmit their ESA and disability information every time they fly. I have complex post traumatic stress disorder and a history of traumatic brain injury. I am on SSDI. I will absolutely not buy an economy ticket because having unpredictable and stressful situations with crowds and feeling confined makes me very anxious. I recently bought a first class ticket for a 6:00am flight because it's cheaper. I can't stand the thought of other people touching me. I have agoraphobia and I become so terrified when I am around other people, I cannot speak or move, I become frozen. Flying is hell for me. I wish it were easier for people with disabilities to have their dog registered as ESA animals. My dog had AKC obedience training, I take her out in public often, she goes to the vet a few times a year. I get treatment at a military treatment facility and it is hard to get a note for me and my dog for me to be allowed to have her with me. Doctors are worried about their liability for writing a note about a dog, as are veterinarians. If doctors only had to write a note that their patient has a diagnosis that did not violate the traveler's right to privacy, or increase the liability of the doctor, this would be best. Perhaps the DOT should have a form for patients to take to their doctors and to fill out. Also, a person on SSDI should not be required to get a note from their doctor for



accommodation as the patient is obviously disabled.

26) yes there may be fakers that slip thru the cracks but most of them can be spotted based on dog behavior before boarding IE barking and lunging at the gate. but not causing added stress because you have one type of disability vs another is worth the possibility of needing to go to the gate desk and pointing out stress/non trained behavior to flight staff. I don't always have the energy to deal with going to my doctor for a disability letter then waiting for a vet appointment for another letter for my dog then the possibility of contacting my trainer for yet another letter for my dog. not to mention that recently my uncle passed away and if i had to do all of the above in a short time it would be impossible since sometimes my doctor is booked out 2-3 weeks ahead of time.

27) Every time I try to book a flight it's a problem. Either the airline asks for paperwork that doesn't exist (like certification) or, when I actually go to board they "loose" my accommodation for bulkhead seating. Having more hoops to jump through for my legitimate, task trained service dog will mean I fly less.

28) I struggle with how to train and accustom a dog to flying without actually flying. Also, I feel teams should be automatically sat in bulkhead or similar extra leg room seats for the comfort of the dog and passengers next to them. Also, if the flight is not full, the team should be given an empty seat next to them for the safety and comfort of the dog. Many dogs that preform guide and/or mobility work are going to be larger breeds and planes are extremely tight these days.

29) I've flown numerous time with my Service Dog. Sometimes all is smooth. Other times, often on the return flight on the SAME airline I have trouble with gate attendants or flight attendants suddenly deciding he won't fit under the seat. He fit on the way.... do they REALLY think he massively grew over a 3 day weekend when he's 7 years old?

30) Life is hard enough. Reasonable access is important.

31) Traveling as a blind person accompanied only by a service dog is already very stressful. Airports are not an easy environment to sightlessly negotiate. I've been traveling alone with a service dog for over 25 years. My dogs have all behaved



impeccably. Why should I have to bear the responsibility of people who can't properly train their dog or follow the rules?

32) I think the policies are creating a lot of stress for people because the rules vary among airline companies and among disability/service dog type. I understand the reasoning behind having ESAs prove their actually assisting with a mental disability but think it is unfair to categorize PSDs differently than SDs. Both are service dogs who are highly trained to mitigate disabilities.

33) All animals that travel should have an up to date public access test by a state recognised trainer or association

34) It is cost and time prohibitive to get some of the paperwork to fly with my service dog. Some of the paperwork is impossible to get. So if I ever need to fly I won't be able to. This seems very unfair. Just because I have a disability doesn't mean I should be banned from flying!

35) I feel if you have a good working relationship with your Vet the inconvenience is minimal. Especially compared to the inconvenience and expense of having my service dog attacked, lunged at, and barked at poorly trained and acclimated animals who clearly are not ready for that type of situation, often resulting in injury or trauma to my trained service dog. I also feel requiring the health certificate and vaccine proof protects the general public from people using unhealthy dogs and those not current on vaccines against rabies and others communicable diseases.

36) Please band ESAs

37) After serving this country and giving the safety to all airlines to make money ,my husband deserve the same safety and freedom to take a fly with his SD.
No one on the wheelchair would be so scrutinize!!!And yes serious discounts would be vert helpful.

38) I have physical pain challenges, PTSD, and financial challenges.requiring extra third party paperwork could stop my access to flying. It can turn a \$600 flight into a \$900 flight. This is a huge barrier.
Also, talking to doctors, the fear of appts. Etc. and the hardship



of attending them with PTSD concerns a 3 hour event can disrupt my regular functioning for days at times or the fear can be so great it triggers flashbacks that make it too hard to go. My service dog is well trained. I have spent years bringing her behavior up to standard.

I think asking veterinarians to certify behavior increases their liability. That can say when a dog is not reliable, but most do not have the behavioral training to identify those that are reliable.

39) Although a veterinarian has a relationship with an animal it does not follow that they would know enough about a particular service animal to guarantee that a dog would not act out or get nervous on a flight. Additionally, what bothers one animal may not affect another. Dogs that are 'passed off' as service animals pose the most threat to the disabled who actually need a legitimate service animal because of the user's being in an unfamiliar environment, unfamiliarity with other animals, and owners that do not know how to keep their animals under control. My vision impairment means that I cannot see animals that are aggressive toward my dog or that are misbehaving before my dog does, thus leading to possible interactions of dire consequences.

40) Something has to be done.

41) The ACAA gave airlines the tools to stop "pets in vests", but they elected to never use them and now are putting the burden for their failure on actual service dog teams. It's not our fault that the rules weren't enforced before!

42) I don't fly because TSA is a trigger for me.

43) It would be a huge help to have airlines know the difference between a psychiatric service dog and an ESA. And to know the 2 questions all businesses are supposed to ask.

44) DOT needs to train their workers at better identifying fake "registration" IDs and certifications. This is where much of our problems are

45) For me it is coming down to this, if my psychiatric disability and usage of a service animal related to that disability is going to be singled out and subject me to extra scrutiny and hurdles I'm just not going to fly. Ever. I'm not handing money to



companies who practice discrimination with policies that single out my disability type.

46) I want fewer fakes and liars and I'm okay with hoping through a few extra hoops to see that happen.

47) I don't mind having a script from my doctor and basic vaccination records such as rabies. But anything more than that is treating people with disabilities like shit.

48) Being disabled is stressful, flying is stressful, please don't make it worse.

49) Untrained ESA's do not meet the criteria or training requirements of my service animal and should not be allowed to impede my service animal and myself. A trained service animal is visible, more so than many disabilities, and an animal's training should be far more crucial to the ACAA than if 'look disabled enough'.

50) The biggest burden I have come across while flying with my Service Dog is that I have never been allowed to sit if a seat that had adequate space for my dog to properly tuck. I've never been offered a window seat to keep her out of the aisle or bulk head so she would have more space. I've always run into problems with people not knowing that there is no "registration" or "certification" for service animals. While I love air travel I avoid it at all cost because it's extremely stressful when none of the employees are properly educated.

51) I generally do not feel like there are extra costs if there is communication between handler and professional (ie... doctor or vet). One should be able to have up-to-date info at next to no cost with systems like patient portals or simply by making such requests at already scheduled with your vet or physical healthcare appointments.

52) The people of the airline should not have to know my specific disabilities for me to fly. It's a violation of privacy

53) I will be answering with a complete written letter to PSYCHIATRIC SERVICE DOG PARTNERS by E-mail [Authors' note: As of this writing, we have not received such an email to our knowledge.]



- 54) As a disabled individual I am already at a financial disadvantage because of my doctors visits, adding this unnecessary financial burden is discouraging and frustrating.
- 55) Employees need to learn the difference between ESAs and Add. SDs are highly task trained. ESAs are glorified pets. They are not at all suited to ride in the cabin of a plane.
- 56) Please stop lumping psychiatric service dogs with emotional support animals. My dog does a task and has been trained significantly more than an ESA. It puts a higher burden to fly on those with psychiatric disabilities rather than physical.
- 57) Please quit lumping psychiatric service dogs in with was they are not the same
- 58) 500
- 59) I no longer fly because of all the problems.
- 60) Money to obtain documents that I don't have.
- 61) I have a well behaved friendly ESA golden retriever mix.
- 62) I would like to state that the staff members knows the laws, I know air line laws are different but if possible ask the two questions 1. Is that a dog required because of a disability and 2. What work or task does the dog preform. Now if a dog is misbehaving or barking and the owner does nothing to correct I ask that they are not allowed to fly. This could be a huge risk for me and my service dog. A dog barking or trying to attach my millions of hours and money trained dog could effect my life forever. I'm terrified of it. Please don't be scared to ask untrained dogs to leave, because you are saving peoples lives who have real service dogs.
- 63) More training opportunities for handlers to get dogs accustomed to flying without disrupting the process would be helpful (e.g. simulations, ability to practice going thru security)
- 64) The laws in place and policies by airlines cause me extra stress which makes my symptoms flare up. I more than likely will not fly often if at all because of it. I feel discriminated against



because I have a mental illness and not a physical one.

65) Should inform airlines of the laws stating “certification” or “registration” on Service Dogs and ESA’s are not recognized and commonly used by fakers who want their pet to fly free. A true handler will not be afraid to hand over a doctors letter for their dog. All dogs (service and RSA) should have basics down and behavior to where they won’t interact or disturb any other dog or person. Bunches more but running out of room.

66) Requiring service animals to get any kind of certificate or letter sets up requirements that are outside the federal law allowing the animal to work in the first place. It also allows airline and airport staff to be making decisions as to what qualifies each animal-a situation that will instigate confrontations and law suits.

67) I'm frustrated by the lack of knowledge of the current laws that individual members of Airline staff have. But I am more than a little bit frustrated by the number of people who bring poorly behaved animals into public places including onto airplanes. Dogs behaving poorly and aggressively toward a service dog can totally destroy the service dogs ability to be used in the capacity for which they were trained. Training takes a minimum of 2 years and often between 10000 and \$20,000.

I absolutely think that websites providing fake certification and registration documents need to be shut down and prosecuted. I don't understand why they are allowed to proliferate. The rule is that the person signing your letter must be your treating physician. Those fake websites do not treat the person they are writing the letter for. That right off the top is fraud. I think that if the airline is going to require paperwork 48 hours in advance of the flight, they should at least verify that it's legitimate. Requiring the paperwork to list how long the person has been in treatment with the provider who wrote the letter would probably go a long way to eliminating some of the fraud. These are simple steps that can be taken that would quickly identify a fake letter from a genuine letter.

68) Imposing extra barriers for psychiatric service dogs and yet treating ESAs (typically not trained and incapable of navigating the flight or stressors of airports and flying) is the biggest challenge to flying as a service dog handler. DOT needs to treat



Psychiatric service dogs the same as all other fully trained service dogs and recognize that ESAs are not the same and should be considered pets.

It can be extremely challenging to find a psychiatrist at times to provide necessary paperwork on short notice

69) I have not even been willing to try flying with my large (fully-trained) service dog. I need reassurance that I won't be hassled.

70) Delta has new ESA paperwork and I had no issues with having my doctor and vet fill it out. I like that the paperwork also requires me to take responsibility for my pet's actions in the gate and onboard. I do not believe Service Dogs should require the same in-depth paperwork as ESA. Too many people try to take advantage of ESA.

71) Putting psychiatric Service dogs with an ESA is unfair to those who have the to help them with their PTSD and more. Psychiatric service dogs are trained to perform a task just like all other service dogs are and are not the same as an ESA. You need to stop putting them with the ESA and treat those who have them fairly and like you treat all the other service dogs. Otherwise requires the same thing of every service dog handler and not just one type. That needs to be changed.

72) It is unfair to differentiate psychiatric service dogs from other service dogs and to consider them the same as emotional support animals. Psychiatric service animals are task trained and necessary to mitigate a disability in an individual, emotional support animals are just pets.

73) Proper education and enforcement of current laws would do more good than creating new, tighter laws. If new laws are made, they should be laws allowing legal punishments for those who commit fraud by passing off an animal as a service animal if they are not disabled or if the animal has not been trained (the burden of proof could be somewhat shared in cases where fraud is suspected, prove the person is fraudulent but the person has chance to defend themselves with proof they are not). If fraud is proven, person is fined, etc. Otherwise, no new laws are needed.



74) Psychiatric service animals ARE service animals. They go through public access training, disability task training and are considered the same across all other legislative documents. To place them with emotional support animals is discriminatory and inappropriate. All dogs should be screen better and more training should be implemented to spot fake dogs.

75) A doctor visit is \$35 with my copay and vet visit is \$55...each takes about 2 hours extra out of my time because I don't live near the vet or doctors office. That's an extra \$90 in addition to the expensive flights. I'm on a limited income. The emotional support animals are the ones giving service dogs a bad name because they are the ones without the proper 18 months to 2 years of training that a real service dog has to go through. Many who claim they have emotional support animal and all it really is is an untrained PET. It's my opinion that the airlines needs to stop allowing emotional support animals from flying in the passenger areas and only allow the real service dogs in with the passengers...this would solve all of the problems. Instead you want to make it more of a burden and punishment for us to jump through hoops because you think the answer is to make it more difficult by adding more regulations to those of us with real service dogs. Emotional support animals should fly as cargo without any additional charge.

76) I believe airlines should follow the ADA any animal that acts against the ADA should be removed from the flight and the passenger put on a do not fly list for a set amount of time scare the fakes make them think twice About risking other people

77) I believe only service animals should be permitted, for ESA's are not required to have any training, and a vet or physician cannot ascertain the animal's ability to handle a flight situation on the basis of office visits. ESA's are the biggest problem on flights. Service animals must be trained for public access as well as the tasks they perform and are therefore better capable of handling the airplane environment. In addition, airlines should be REQUIRED to accommodate the necessary room for the service animal without charging extra if an upgraded seat or bulkhead seating is needed for a larger dog or miniature horse.

78) I am a totally blind individual who is a service dog handler. I have several life-threatening illnesses as well. When I travel, I



must take tons of luggage,- not just for the service dog; but, for me as well. I am worried and concerned about fake service animals, there needs to be something straight across the board to keep the fake service animals at bay... Such as a hefty fine, etc. But there is really no way to implement this or any other punishment without a legitimate national. Certification authority. I do not mind getting vet records once a year to fly; but, there should also be a national certification... and a person should not be required to check in with an agent at the desk just because of a service animal. For me, the extra hassle is dangerous to me; as, for me, the less contact with people, the better.

79) I think that an animal that is a ESA should be required to be muzzled since they are not required to have training of any kind, they are only comfort animals. I also think that the only types of ESA animals that should be able to be not in a carrier with the person should be dogs above 10 lbs. The others should be required to be in carriers or muzzled while on the flight. That'll help with distracting service dogs from doing there job on the flight. I also think that if a person who has a ESA animal fly's with their ESA and it causes problems then they should be flagged and not allowed to fly with a ESA again.

80) no regulation will be effective unless 1. airline staff are properly educated and 2. animals who misbehave prior to boarding or takeoff are not allowed on the flight. Few veterinarians or doctors providing documentation understand what a service animal or emotional support animal actually is, but a properly socialized and trained dog will be fairly obvious.

81) The problem is arrogant dog people who think they know everything and pseudo service dog groups who try to "educate" the public and have no idea how damaging they are to the community. Educating the public without media interference is the best approach. Correct knowledge is how we help each other.

82) Please stop putting Psychiatric Service Dogs and ESAs in the same group. Psychiatric Service Dogs go through as much training as other types of service dogs so it's unfair to discriminate. Not all disabilities are visible. If someone has epilepsy, you can't see that, but those handlers don't have to provide the same pre-flight paperwork as someone with a psychiatric service dog. I'm okay with you requiring extra for



ESAs, since they're generally not trained, but this whole discriminating against people with psychiatric service dogs has to stop

83) The disabled with task-trained psychiatric service animals (NOT emotional support animals (ESA)) should not be treated differently than other types of service animals. A service animal is NOT the same as an ESA and should not be grouped into that category. They have nothing in common and it shows a lack of understanding of service animals and infringes on the rights of the disabled. I support more stringent requirements and documents for ESA as they are the ones causing problems on flights, not actual service animals (psychiatric or not).

84) My guide dog has been trained and vetted to these conditions and situations, and we have flown thousands of miles with no misbehavior on my guides part. IF the airlines actually FOLLOWED the already existing regulations in the ACAA, the issue of misbehaving animals would cease to exist. There is no need to further burden legitimate service animal handlers because of the airlines unwillingness in conforming to already existing laws.

85) My son has a trained service dog with specific tasks, but because they're considered psychiatric he and his animal are treated like people who are bringing a completely untrained animal to give them support. We spent 5 years and ~\$12,000 training this dog to his tasks, and it feels like discrimination. The policies say they're not tasked trained, they are and people with task trained, actual service dogs for psychiatric issues have a harder time in general being singled out, it's incredibly stressful situation and frankly discriminatory. Their disabilities are not less than a blind or deaf person.

86) Asking a veterinarian to sign a statement that a Service Animal will behave on a flight is absolutely insane! They are not going to open themselves to the liability of a lawsuit for "predicting" behavior.

87) Flying with a service dog is becoming a mine field

88) We put countless dollars and hours into training these animals so we can do things that you take for granted. Most of us would never fly unless a family member was on their



deathbed or dying. For most of us, the trip alone is a traumatic experience. To have to fight airline staff that don't understand the laws or our rights is de-humanizing. We already have to fight the general public and poorly trained staff that want to pet, talk to, or otherwise our service animal from doing its job. Please don't make it worse than it already is for us to use our right to get on an airplane to visit loved ones. Discrimination is a very real challenge that we experience daily and we don't want to be trapped on a plane with it.

- 89) 1. I believe further restrictions should be placed on species of animals permitted on aircraft.
2. I do not believe adding additional requirements for emotional support or service animals will change the presence of aggressive, untrained, unruly animals. Pets are still allowed on board for a fee, and I've never seen a flight attendant actually insist that said pet remain in the carrier. (Personal experience as well - many years ago, as a child, we took our pet kitten out of her carrier and the flight attendants said "we're supposed to tell you to keep her in her carrier, but she's cute!")
3. I believe in imposing mandatory evictions of animals misbehaving in airports. Your dog barked, growled, peed on the floor? Immediate dismissal by airline employees or airport staff. It's not like airports aren't flooded with cameras to prove a poorly behaved animal. Allow the owner to return to the airport without the animal in tow, regardless of service animal, emotional support, or pet status, but DO NOT hold the flight or provide them with any other unnecessary accommodation. They can have the option to standby. If someone was drunk or committing any other crime, or acting suspiciously, they would not be granted to board just to save face. We shouldn't risk or be at risk of an animal attack just because people don't want to train or leave Fluffy at home.
4. I believe requiring vaccination proof is highly immoral when it requires vaccinations that are not federally required. There are legitimate reasons to do low vaccine protocols (i.e, one of my dogs literally sprays blood for 48 hours after any vaccine), which doesn't affect the workability of an animal. Titer tests should be permitted. Some animals / states grant rabies waivers as well, so those animals should be accommodated.

By imposing more requirements (i.e, vaccines), we're only punishing disabled individuals for the crimes committed by able bodied people. We are being subjected to unnecessary charges



to acquire updated veterinary records, doctor records, and are forced to undergo more scrutiny and questioning by airline staff despite not being the ones responsible for poorly behaved animals.

We are already facing the threat of being unable to make emergency trips for those who fall under emotional support animals or psychiatric service dogs. Why should disabled patrons be prevented from accessing critical travel because of the basis of their disability or the disability device in which they use to mitigate? Should someone be denied saying goodbye to their parents or their children simply because airlines are allowed to impose such aggressive and inhumane restrictions? No other patron must wait 48 hours to be able to board a flight, therefore people with mental disabilities should not be singled out.

For me personally, I lost my health insurance because of my age. I rely on government health care which can take very long times to find available appointments. The fact remains, for most individuals, it is stressful to be able to get a doctor visit and then to require them to rewrite a letter following a specific outline. Some individuals simply do not have a doctors note (i.e, many blind patrons) to support their need for a service animal, yet they have still obtained a program trained animal (with regards to several blind individuals).

Veterinarians charge anywhere from \$50-100 for just making an appointment. Health certificates are generally \$50-135. Vaccinations, if the frivolous ones are required, may cost upwards of \$100. And then you've got to answer the question if vaccinations are considered immediately valid, or if there is a 21 day period in which you must wait prior to traveling.

If an individual doesn't drive, you must account for the cost of a taxi or ride share. Assume they don't face discrimination there, they still have to hope they're in a service area. Where I live, I do not have access to ride share companies and taxis are limited and take advantage by overcharging.

Subjecting disabled individuals to additional charges, stress, and complications because able bodied employees are too scared or too untrained to kick out misbehaving animals is just appalling.



90) It would be immensely helpful if airports or airlines provided occasional access to airports and airplanes for training purposes, so that service animals can be introduced to the unique noises/activities in those settings before an actual flight. As well-trained as an animal may be, it's hard to predict how they will respond to such an unusual environment until they have been exposed to it.

91) untrained dogs have been a huge problem! We have been barked at over a dozen times during flying. Once a dog lunged at us to the end of it's leash. My dog is a Celiac medical alert dog with over \$20,000 and 72 weeks of formal training. He is trained to absolutely NOT respond to aggression so when the dog lunged at us he looked ahead and kept walking. I know many dogs who have been severely injured and 2 even killed by these dogs being aggressive to actually trained service dogs. The other thing I would like to say about this is the ADA has a definition of disability. Many persons do not meet the criteria of disability. The person with the disability must have limitations that SIGNIFICANTLY limit one or more life areas. Merely being diagnosed does not qualify a person with a disability. I am 100% for more stricter policies on service dogs. I might also add that I am a doctor of psychotherapy and I work with many clients with SDs and I do workshops for medical and mental health professionals with use of clients using SDs.

92) The American disability act covers what is right or wrong. I had an airline ask for proof of my disability, this is not acceptable. With a disability it's bad enough to go through daily life much less prove I have a disability. Also how is a Veterinarian to know how an animal acts in public. It is obvious when seeing a well trained animal and one that is not trained.

93) Personally I would allow service dogs and disallow emotional support animals from flights. Special training is required for it to be safe and not stressful for both the animals and people.

Disabilities should be treated equally. There needs to be a way for travel to be fully accessible including in case of emergencies or without having to always pay for the upgrades to manage a flight in minimal comfort.



94) This has gotten completely out of hand.... my well trained dog has been attacked in airports.... I would rather present a letter and his CGC certificates knowing it will decrease the likelihood of him being harmed.

95) untrained dogs pose a safety risk for me and my service dog. I would like to see much stricter requirements related to control of dogs and behaviors.

96) Although I have no problem providing the paperwork for our highly trained service dogs my disabilities would be challenged with the extra time to get it.

97) The fact that psychiatric SD's need a letter and people with any other disabilities don't have to is extremely inconvenient & discriminatory. A disability is a disability, why does the airline need to know my SD is for PTSD vs a mobility issue? Simple answer they don't need to. My health conditions are my Business no one elses

98) A service dog is the ONLY animal with public access rights. While airlines have tried to accommodate persons with emotional support animals, I fully believe this is an underlying reason for the many problems we are now facing. A service dog has two or more years of training plus passing the Canine Good Citizens test and the Public Access test. It does not matter whether or not this is a "program" dog or an owner trained dog. The standard is the same.

Those of us who use a service dog keep up working with our dog to maintain their skills. We also adhere to high standards of health care for our dogs, including annual checkups, parasite prevention, vaccinations and grooming. We use quality equipment as a harness and collar and leash. This all means I can count on my dog 100% to behave in a manner of respect to those around her, be clean and well groomed, have her shots and vaccinations up to date and not cause any problems for others at the airport, in flight or at our destination. She will not growl at you or bite you or your dog. You will not get fleas from her and she will not jump on you or knock you down.

An emotional support animal can be an animal other than a dog. This results in people who bring pigs, peacocks, cats and other animals onboard. Even if emotional support animals are



restricted to dogs and cats there is still a huge potential for trouble. These animals have no training or experience out and about in public or in crowds. Just the noise of an airport or airplane engine can frighten them. They don't deserve that. And just because their human wants them to be there, the animal may want to be home. There are no health or grooming requirements, and there is no equipment requirement to secure the animal. The animal can be unwashed and stink, have fleas or ticks or worms and carry disease that can be passed to humans. The equipment can be shoddy or broken and result in the animal getting loose. This could be a cat who wails in loud protest all the way from Los Angeles to Tokyo or the toy poodle that yips and snaps and growls from New York to London.

If I have to provide third party documents so we can fly, I will need to get an appointment with my veterinarian and/or health care provider, travel at least 20 miles one way for myself and 8 miles another way for my dog. I will have to pay for the appointment at full fee for the time I spend with either medical professional. And I will need to do this all ahead of the time we are to fly. If I had to fly to North Carolina for an emergency with my son's family, there are no exceptions to these rules. If one of my parents lived that far away and became gravely ill, I could miss seeing them before they pass away.

The last time my dog and I flew was in 2013, before the changes in regulations. We had a wonderful experience. Airline and airport staff were kind and courteous. I did call ahead of time to let them know I have a service dog and there were no problems. That said, there have been numerous incidents where I have had to educate staff in stores, restaurants and hotels. One hotel I stayed at four different times within a few months, I had to go over ADA law every time I checked in. I was asked questions that should not have been asked, documents were asked for that I do not have to provide and I was asked to sign a waiver I do not have to sign. Just because business staff has been trained in the treatment of service dogs and their handlers doesn't mean we don't have problems.

I volunteer with a program that trains psychiatric service dogs for Veterans. If these dogs are not treated the same as all other service dogs there will be problems. I have read about psychiatric service dogs (psd) being required to be crated from the lobby to the gate of an airport. For a Veteran with Post



Traumatic Stress Disorder (PTSD) and panic attacks this would prevent them from flying. A service dog cannot do its job in a crate. A Veteran or anyone using a PSD who has to be singled out for checking in, provide additional documentation, going through security or boarding, with different requirements than a person with a guide dog or medical alert dog, is being discriminated against. A psychiatric service dog is really another form of medical alert dog, just like one who alerts for seizures or blood sugar changes. A PSD alerts to her handler's panic attack, fear of large crowds and wanting to flee, then performs as trained to mitigate the problem. I am looking forward to retiring in a few years and traveling to Europe by plane. And I look forward to being nothing more than just another passenger who also just happens to have a dog. Thank you.

Mary Jimmerson
25623 340th Ave
Underwood, MN 56586

99) I fly Delta because they handled my service animal the best. The other airlines scare me to use. I can't imagine stuffing my 45-pound dog under an airline seat for a couple hours. She'd do it. It's just highly uncomfortable for both of us. In security lines, "ESAs" often cause a ruckus around her, though she never reacts. I don't like having to provide paperwork, but I would if it would decrease the amount of fake service animals being touted around.

100) My service dog has been lunged at, harassed, and nearly bitten multiple times in airports and on airplanes. Airline employees need to know their rights when it comes to protecting themselves and their clients from poorly trained pets. An ESA is NOT a service animal.

101) Airlines must insure that emotional support dogs are well trained. I have been on flights where my Seeing Eye dog was almost attacked. The airline personnel did nothing. I had to basically get in the passenger's face to make sure she held her dog tightly and it continued barking. I do not feel safe traveling by air anymore due to the number of "emotional support dogs" without the training that most service animals get. I hope the airlines follow up with emotional support dogs to insure safety to all passengers.

102) Emotional Support Animals should NEVER be allowed to



fly unless in crate and remain in crate. Service Dogs are the only SD that should be allowed to fly without crates and with the handler.

103) I have flown quite a bit with my service animal and find either they are totally trained and accommodating or they don't know anything and have even mistreated us. It doesn't seem to matter the airline or geographical area. It is like a gamble by the flight. Across the board training like McDonalds finally did would solve the problem. Now we as handlers have to be equally responsible. Our service animals should be in our control and behaved at all times. Not barking and causing a scene. Yes they get frightened sometimes and have to be forgiven but after that calmed down and as useful as any medical device.

104) The focus should be taken off of those with disabilities and put on those that are abusing the system and falsifying information who do not have disabilities nor have sufficiently trained assistance animals.

105) I have been traveling for 30 years with no problems prior to emotional support dogs. They are not trained in the same way my guide ulis and it is unfair to the dog and passengers

Focus on the behavior

106) ESA need to at the least been put through an obedience class so that they know how and how not to behave. It is the ESAs that cause the problems for those like me who have a service dog. People also need to not use those retractable leashes because not only are they not controlling their dog but those leashes can injure someone when wrapped around them as well as cut into the skin of a person or dog for that matter. You also need to treat those who have a psychiatric service dog the same as the other service dog handlers because they are trained to perform tasks to help the person to mitigate their disability. I have PTSD, Anxiety and panic attacks, nightmares, high blood pressure and seizures that my service dog alerts me to and more. So just because my PTSD is my main problem doesn't mean my service dog is like an ESA because it isn't and that doesn't give the airlines the right to ask me to fill out what those with an ESA do when my psychiatric service dog is a service dog trained to mitigate my disability and not emotional support.



107) The time and \$ it would take to provide documentation from a vet or doctor could be a huge hindrance-some doctor's, especially any sort of specialty or psych doctors, typically have extremely long wait lists to be seen, even just for paperwork it may be 6 months or longer before you can get in to be seen/get paperwork, not to mention the cost of the appointment!

108) This doesn't just affect the disabled, it also affects everyone in their lives involved with booking, transporting, escorting, and handling the disabled person as well as ALREADY having to put up with hand swabbing and guaranteed TSA screenings while surrounded by people actively gawking & staring at myself, those in my party, and my service animal. It would be helpful to keep those with disabilities in temperature controlled areas and out of inclement weather and out of sunlight and not on tarmac that can burn us or our animals' feet. It would be great to train staff how to wholly ignore working animals and beneficial to teach how to not add to the stress burden we're already facing traveling.

109) I want my right to be able to travel freely, whenever I want, with no extra burdens placed on me to remain in force even though I have a service animal.

110) I feel that I am lucky in that I have a good relationship with my vet and my doctor. There comes a point when asking a vet to sign for a dog's behavior that seems inappropriate as the vet is not involved with training.

I would love to have an affordable national certification for citizenship that all service dogs should pass. Special tasks should not be considered as they are so unique.

The hardest part about travel for me is the energy I expend getting ready to travel. This is very taxing. It causes travel to start off very hard due to fatigue.

I also weigh the risk of being exposed to illness. My immune system is not compromised, but I often get sick after traveling. And I take great care with keeping hands clean.

Also, please consider expense. I have zero income today. I cannot travel. When disability pay starts, I will be on a limited income. I will be unable to jet around the world. I would like to fly to see Family in the next state from time to time.

I am grateful for the opportunity to travel with my SDiT. I would not travel without her.



Thank you

111) Psychiatric SD's should stop being lumped in with ESAs. Airlines should not be allowed to accept certifications, registrations, or IDs as proof it is a SD or ESA. Either make all SD handlers provide documentation or don't (doctor's letter, vet record, etc.). I think having ESA owners provide a letter is good, but it's hard to tell if it is legitimate or a scam therapist. ESAs should also be trained to be able to behave in public and in an airport-type setting, and that they should sign an attestation that their animal can behave and is trained. This should not be a form signed by a veterinarian (extra cost and time is not okay) as vets are not behaviorists nor have trained the animal and it would be a liability for them to sign it, and requiring a trainer or behaviorist to sign a form would be unfair as not all people have trained their animal with a trainer. Similar regulations should be put in place to those of the ADA. If an animal is uncontrolled or a danger, the airport can ask the animal be contained in a carrier, muzzled, put in cargo, and/or removed all together. Also, flexi leads should be banned from use in airports and on flights.

112) My dog is not allowed to be vaccinated due to an autoimmune disease that he might have, although there's no way for us to figure out if he does in fact have it. However, he is still protected from the illnesses he was vaccinated for as his titers came back positive less than 6 months ago. But, my vet would not be able to say that he is up to date on his vaccinations because he isn't, although he is immunized. This doesn't make my dog any less of a service dog than anyone else's service dog, so how is this fair? He is also a tiny service dog, but still very real, although some people don't take him seriously because of that. I am scared that I will no longer be able to travel by air with my service dog even though my disability requires it because of all the fakes and the paperwork that my vet won't be able to sign. Also, ESAs and PSDs need to stop being lumped together because they are NOT the same thing!

113) I choose to use my service animal because I feel that she enhances my travel experience. I should not be penalized for that choice because of someone else's poor decisions. Increased documentation requirements would severely limit my ability to fly, as the extra paperwork can be out of my budget at



times. At the same time, other people's animals have repeatedly harassed mine, both in and out of the aircraft cabin and I feel this needs to stop. Documentation, however, is not the answer. Misbehaved animals should not be permitted to board aircraft, and airline personnel should be well educated on the various aspects of service vs. emotional support animals.

114) As a blind guide dog user, I'm confident that a Veterinary record wouldn't be effective in allowing animals to fly. Veterinarians are not equipped to handle whether or not an animal has the proper behavior to fly. A service dog trainer or program is the only one with that authorization. Furthermore, Veterinary records can be difficult to get for last-minute flights which would discriminate against people with disabilities using service animals. Emotional support animals are often not trained to be in public places, and the stress caused by flying can cause the animal to act out where they otherwise would not have behavioral problems. All these factors lead me to believe that there are two options the Department of Transportation can take. First would be getting the owner of any type of emotional support or service dog to sign a document stating that they are liable for any harm the dog does to other passengers. I believe this will discourage those flying with animals not properly trained from being on planes, and help Airlines deal with the repercussions of inadequately trained animals. The second option is to help us advocate for some type of national certification which will implement a type of behavioral standard. Thank you for looking into this issue.

115) I do not feel that we should have to incur the cost of getting a Dr to sign paperwork. I have insurance you have the Co pay. No insurance expensive. Someone who has a SD should show training certs. A person should be held liable for the service animal they bring on board.

116) I understand the additional requirements for an ESA, but a psychiatric service dog should be treated the same as any other service dog as they all go through the same training!

117) Service animal users like myself who use trained service animals would not be able to fly in short notice, which would cause inconvenience and possible problems with work and family

118) The burden of having to get paperwork every time I asked



you to fly would be a serious hamper to my ability to travel. Because I do not drive arrangements need to be made take care of paperwork.

119) Time and expense of getting vet or other letters will prevent me from flying. It just would not be worth it.

120) There needs to be a way to protect real service animals and put a damper on fakers.

121) I do most of my service dogs' immunizations with the exception of rabies. I studied Veterinary Medicine for two years and am qualified to treat my dogs. Having to get medical clearances for my service dogs would create an undo hardship on me. I also owner train my service dogs and requiring me to obtain a third-party documentation would also create an undo hardship on me. On a recent flight I had one of my service dogs with me and there were a couple of ESA animals on board that caused a ruckus in the back of the plane. It is my firm belief that ESAs should be trained to behave appropriately during all modes of travel.

122) The base determination should be behavior in the moment. If a dog is acting unsafe and the handler unable to control the dog, they need to be asked to leave or crate the dog. Bottom line. No second chances to be reseated or warned 'control the dog or you'll be asked to leave'. Behavior in the moment is the only observable thing that across the board will increase safety, fairness and reduce undue hardship and liability risks.

123) The ADA and ACAA should mimic each other as much as possible. The cost of doing the above is minimal compared to the other expenses of having a service dog. As an example, vet fees, shots, food etcetera. If the ADA and ACAA requires the above it would discourage people passing their pet off as a service dog to save money. It would also reduce the growing problems airlines and business have

124) Regardless of what policies come to fruition the language needs to be clear, consistent and concise. All airlines flying within the US need to follow them. ALL staff from ticket agents, to TSA, to custodial, to pilots and stewards/ stewardesses need to be required to take a training AND demonstrate via written



exam, taken independently of an instructor's help, that they understand the law with 90% or greater accuracy. Certificates purchased off line are to be recognized as false, as the above will have a comprehensive understanding of the ADA and any further policy. Policy must state that a party found to be falsifying records or not have a fully trained dog or miniature horse will face a fine, participate in community service 20-30 hours with a Service Dog trainer helping others to mitigate legitimate disabilities OR a fine and up to 10 days in jail with the offense becoming a permanent part of their criminal record that can not be expunged.

125) Currently disabled users of Service Dogs (not emotional support) are not all treated the same. Only psychiatric service dogs are subjected to "proof". If this is the new standard, then ALL service dogs must comply, or remove the extra burden. By definition, the requirements on psychiatric service dogs and their handlers today, are discrimination.

126) I wouldn't want to go through the hassle of ensuring I have the documentations for my service animal to fly because usually when I have these documentations, they never check them and I wouldn't want to make any last minute appointments and pay more than expected before a trip to ensure my service animal is good to fly with me on trips.

Why don't places that provide people with service dogs with a 'license to have a service animal' (similar to driving) to ensure they are allowed to have their pet in public places/on flights? This would make it harder for people who pretend to treat their pets as a service animal to get a license.

127) there are already provisions in place for poorly behaving ESA or service dogs

128) I think esd's should have to pass a public access test such as the cgc to be allowed to board a flight. Maybe they could have an ID to say such and such dog is trained for public. Service dogs are already trained so I wouldn't change anything regarding them.

129) It's already too hard to fly. If I had to go through all the extra time and expense of getting an additional veterinarian's letter, I doubt I would be able to get it all done in time, especially



if I had to fly somewhere quickly, like to see a dying family member or to attend a funeral. My veterinarian may or may not even be willing to write a letter. She only sees my service dog in one environment, and doesn't go with me to any situation even remotely similar to an airplane or airport. My service dog is really well behaved, but how would a vet be able to vouch for his behavior in a totally different environment she's never even seen him in?

I still think it is unfair and discriminatory to require handlers of one form of service animal (psychiatric) to have to compromise their personal privacy to give a doctor's note to the airline about their incredibly stigmatized condition, while other service dog handlers can just walk through without papers. Mental illness is so stigmatized in this country that millions of people delay or avoid getting help for their potentially life threatening condition, sometimes for years! Some people actually end up completing suicide rather than getting help and letting people know they have a mental illness, in part because people have incredibly negative and inappropriate reactions to our disclosure of our mental health status. Why is it necessary for us to disclose this private information to strangers who could easily mishandle the information? It makes an already difficult and stressful time more stressful and difficult. Please consider changing this law, because it negatively impacts us every time we fly.

130) There are already two international bodies which regulate and accreditate guide dog and service dog organizations. These are the International Guide Dog Federation and Assistance Dog International. (IGDF/ADI). The Council of US Dog Guide Schools can also provide assistance to lawmakers. The Chair of the Council this year is Sandy Merrill / Guide Dogs of Texas / 210-366-4081. Please feel free to contact

131) The department of transportation is required to follow ADA laws. Not make their own laws about people with disability. If I have a guide dog trained from a REAL guide dog school an ID card is issued. The airlines scouts get a list of real schools from any guide dog organization. They all work together.

132) I starting flying with my Service Dog 10 years ago and have been fighting for equal status for my disability all these years. Now we are going backwards. Discrimination is Not how to fix the problems that the Air Carriers started by not



understanding what they were doing when these regulations were written and updated.

133) I have had different demands by security at different airports that were illegal to CURRENT regulations (my SD's collar, vest and leash were demanded and if I did not comply invasive body search to me was implied, so I was left for 30 minutes with a completely unrestrained SD, while KC, MO airport played with a flat buckle collar and leash. My SD stayed in an off-leash heel, but was shoved and kicked by passengers grabbing trays. My SD is more likely to be harmed by security dogs than ESAs. I was forced to leave my SD in line in a down at the Denver airport, with people right behind him who could kick or step on him. He was 20 ft behind me, off leash, when I was sent through the detector, until I was allowed to call him through. I haven't found a single airport except Spokane WA airport, that has screened by correct guidelines.

I have tolerated this because the actual airlines I've used have followed rules correctly. Now with added fees and preferential treatment for organization dogs, which any trainer can start up an organization, so it does not mean the dog is better trained than those SDs privately trained, I have started driving. I am exploring Amtrak for my next trip if airlines continue to make traveling so stressful for actual disabled people. They do not care about the stress/safety of the disabled handler at this point.

134) Standardised IDs from IGDF accredited schools or ADI schools with a proof of public access test dates within 12 months should suffice. The real concern is the fake service dogs from non-accredited schools that the airline knows nothing about.

135) My multiple physical disabilities are invisible. I have never had to disclose my medical history to non medical strangers to fly, but the changes would brink on violation of HIPPA for many SD users.

Also, this is program SD driven. Any trainer can start a SD program, there are no training certification requirements. I teach obedience classes, I could start my own program tomorrow if I had the space. I already have experience training SDs. Just give myself a business name and certify my own graduating dogs at minimum ADA standards and tada "program SDs." Instead, I've training SDs far beyond ADA requirements, with many tasks for my own use, so my SD are Owner Trained, not



"program certified" -which the airlines do not understand proves nothing. There are VERY bad programs out there. Veterinarians are not trained to assess behavior unless they are behaviorist. You usually have to travel long distances to find a Veterinary Behaviorist. A regular vet cannot even teach dogs basic obedience. How can they determine how a dog will behave?

Most vets will not sign off on predicting behavior of a dog due to liability.

Airlines have no clue how they are designing these laws.

This punishes disabled fliers and I will find other modes of transport, even though both SDs I have had have been model fliers and model working dogs in public, the ambulance, the ER and hospital.

136) I spent over 8 hours answering Allegiant's questions and accusations!! They continued the harassment and discrimination against me and my SD's. My SD's have flown over 50 round trip flights!! They were primarily concerned about making money. The emotional distress they caused me was unacceptable. My physical disabilities require my SD's to be with me.

I understand the need for guidelines, in order to weed out the "fakers". Making it so difficult for real SD's, is not acceptable. The expenses and stress caused by additional rules, is unacceptable.

137) The DOT should consider only allowing service animals that are from accredited service animal training programs to ensure animals are legitimate.

138) The most significant burden to me would be the allowance of emotional support animals on planes. These animals are not trained by a professional trainer 95% of the time. These are the animals that pose a significant risk to my guide dog as well as to myself and others. These animals should not fly.

139) I suggest you consider that the traveler provide a document from the organization that trained their animal as



proof of health and safety instead of from a vet. For most dogs that are trained service animals, the organization that trained them provide such documentation. This certificate/card proves both recipient and dog have passed rigorous certification tests for public safety and behavior-- including crowds, controlled behavior around other dogs, and loud noises-- as well as provide the organization with current health reports of the animal from the vet. We must pass this recertification process every year. Most vets do not provide this level of behavior and training testing. In my opinion, the documentation from the training organization is more rigorous, has more authority, than a simple report from the vet. Also, the cost is very low, only the time it takes to undergo the required test. We do not have to pay for the testing nor the certificate.

140) While the focus of disability rights should be protecting access. Nationally, there does need to be a crack down on fake service animals gaining access. I have had to weigh carefully if I can take my Seeing Eye dog to certain places based on how many untrained and unruly fake service dogs I will most likely encounter. A legitimate service dog remains under the control of the handler, not allowed to interact with other service animals and/or people without permission.

141) Having a disability makes for a tight budget and any added costs of flying could hinder my future flight plans. Folks lying to be able to bring their pet on board as a service dog should be fined heavily!!!

142) ESA animals should be banned from flying in the cabin of the plane unless they are in a carrier. They pose a threat to my guide dog. Since I am blind and can't drive, I would also have to pay extra transportation costs to get to and from the vet.

143) DOT and various airlines allow the proliferation of mental stigma in grouping psych service dogs in the same category as ESAs, i.e. limited to no access. Just because my disability is not visible does not make it any less valid. Forcing people with service animals and mental disabilities to jump through more hoops than an apparent physical disability is discrimination.

144) I do believe that all uncrated dogs should be trained and accustomed to very stressful public environments prior to flying.



145) Many airline employees do not know the ADA laws, sometimes cause time delay to research and added stress, sometimes charge for service dog equipment, sometimes make me cry for all of the questioning. A Dr. Letter should be good for 5 years. Disability generally doesn't change or should be listed as temporary. Also, I am happy to supply a letter of training and able to handle airplane stress, but who signs this? Especially if I do a lot of self trainig. Lately flying is awful due to airline staff.

146) My primary concern is in the event of an emergency, if someone does not typically carry an up-to-date veterinary record with them at all times, a policy requiring all or some service dog handlers to first procure that paperwork, then submit it to airline personnel, and then finally wait to learn whether it was deemed sufficient by airline personnel could seriously interfere with a handler's ability to travel. One day could mean the difference between a handler arriving in time to comfort a dying family member and arriving only after that person is gone. I think, if veterinary records or attestations of suitability to fly are to be required, there must be exceptions made for extraordinary circumstances. I also foresee a problem with veterinarians being reluctant to state that a particular animal will behave while on an airplane. I do not believe vets often have much knowledge of their animal patients' temperaments outside of the office exam rooms -- a dog who cowers in fear at the vet may behave beautifully on a flight, while an outgoing, easygoing dog in the office may become terrorized once a plane takes off from the tarmac.

147) Disabled individuals should have to provide proof of vaccinations for the safety of others flying, and the pets in question should be able to handle the situation or should fly crated (namely ESAs, who may not be trained to accept these situations), but handlers should not be required to obtain additional documentation for working dogs. You wouldn't charge an individual \$100+ and require a Drs note to bring their wheelchair with them, so why is it acceptable ask a service dog/esa handler to get a drs &/or vets note that will cost \$100+ to bring their own working dog/medical equipment? A letter signed by a vet or doctor saying the pet is of sound temperament to fly would be okay if the handler would not be charged for it, but charging a person additional fees(in the way of out of pocket vet/dr appts) to bring medical equipment is unacceptable.



148) Lack of training

149) If you require a doctors note for one type of disability it is fair to require it for all of them but doctors need to sign that they have read and understand the law and liability for lying and a rabies vaccination is already mandated, a vet is only responsible for the dog's health not training and emotional support animals should be given free carry on or cargo services since they aren't trained to handle the stress.

150) Airlines and associated groups should create user friendly and convenient tools for efficient effective travel that is accommodating to all who need it thereby minimizing the extra burdens.

151) The persons who use a “trained” service animal as well as the general public should not have to worry about “untrained” animals being brought on planes. Therefore, it is hard to prioritize either or protection for the disability community that use “trained” service animals and making sure that “fraudulent” service animals aren’t allowed. It’s not black and white. Even “trained” service dogs can have an accident in flight no matter how diligent the disabled partner has been to prepare the dog for the trip. Just like us they get upset stomachs etc. That is why even if the dog is well behaved things do happen. We just don’t want “untrained” dogs to come on board and cause our dog trouble or hurt anyone and that includes our dogs. Enough is enough. We need to do something about these “so called service dogs” that aren’t trained but are “pets” instead. I don’t know if I’ve helped but I hope so.

152) I feel that some people are not understanding of people who have service and Esa animals and therefore are not as supportive to us, and I feel that they make us pay more than the average person because of our service and Esa animals that are trying to help us.

153) While I understand esas being used as fake service dogs is an issue, I don't think the issue is common enough to make an already disabled person go through more challenges than we already face.



154) People using animals for comfort are not taking into consideration that other people have allergies to animals are afraid of animals .Service dogs are defined by the ADA and are a value to their quality of life. Service dogs are trained for certain tasks. Comfort or emotional support dogs not trained for these task but to help needy people cop with life. A short time of speciation during a flight is a small inconvenience to pay for the consideration of the rest of the passengers

155) I realize it would be *highly* inconvenient but I would recommend that, just as there are training flights for other skills & knowledge, it would be extremely beneficial for *all* airline personnel (incl gate persons) to role play a person with disabilities, with a service dog, & with an emotional support animal. That is truly the **only** way to understand the major & minor challenges people with special needs incur. "You can only make decisions for someone (or about someone) **after** you've walked a mile in their shoes."

156) The additional cost for obtaining documentation would be a financial burden, along with additional personal time needed to obtain the documentation. More training and education of airline personnel and also of the public is needed so that people understand the difference between an assistance dog trained to mitigate a disability and an emotional support animal who merely only provides comfort and may not be trained at all. I am fearful for the safety of my Hearing Dog whenever we fly and there are also emotional support animals onboard as well. Because I have no idea that the emotional support animal has been trained and is socialized enough to be around assistance dogs. I rely on my Hearing Dog to help me hear sounds I cannot and I am responsible for her safety and well being at all times. Please don't make it harder for those who are partnered with a well-socialized, trained and healthy assistance dog to be able to fly. Any rules or regulations should not be so stringent that it creates any kind of burden for a disabled person. We have our assistance dog to help us be independent, please don't make it harder for us. However, I do think that allowing ESAs the same ability to fly in the cabin, they do need more regulations and assurances to the airlines by whatever means, that their person absolutely must have them onboard to help their partner. The airlines should most certainly ascertain that the dog in question is indeed able and capable of flying and needed by their partner. Too many people are taking



advantage of the lax rules in order to allow their pets to fly in the cabin by saying it is an assistance dog and/or an ESA. I also would like the DOT, the airlines and whatever agency needs to be involved, to get more in line with following the DOT regulations for assistance dogs and only allow dogs to fly in the cabin, and NOT to allow any other kinds of animals. Miniature horses are also mentioned in the ADA/DOT regulations. It is disruptive to all when a pig, goat, snake, or any other kind of animal is allowed on a plane.

157) Please do not punish the legitimate Service Dog users in an effort to deter the "fakers". Please do not burden persons with disabilities in an effort to punish lawless persons. Thank you for please understanding that persons with disabilities already face a multitude of challenges before they even arrive at the airport.

158) If ESD are allowed to fly they should have the same training as SD

159) Ever since the ESA peacock and the ESA that but the child incidents and airlines have started putting more restrictions on service dogs flying I have been very anxious about flying a friend recently wanted me to fly out to help her drive back to our home state and the whole idea had me thinking of other travel alternatives because flying with a service dog is already such a pain since the incidents. Unless I have to travel over seas i will be looking for other ways to travel

160) I have no issue documenting my SD. I do have an issue with untrained dogs messing with my \$20,000 dog

161) Muzzles for ESAs as a safety precaution to avoid anyone getting bitten. Legitimate trained service dogs (of any age) will never ever bite someone, even if they harassed the dog or the owner and they deserved it. ESAs are pets and are not required to have any training, and are not public access trained. Therefore they are statistically significantly more likely to panic in a crowded environment like a plane. Muzzles are typically associated with negative things but they are a very positive and useful tool for almost any situation when used properly.

162) If flights attendants are given power to remove service animals for acting a certain way, they need extensive training in



reading and interpretation of canine behavior and not flight attendants can be hired who have a fear of dogs, period. You cannot have any personal prejudice in the decision regarding canine behavior. Period.

163) esa's need training to be able to fly. Not training your animal puts legit service dog handlers at risk.

164) My concerns are realistically about the airline personnel. If a Service Dog yawns, shifts its body or makes so much as a peep, it doesn't mean that the dog is agitated to the point of needing to be thrown off a flight as has happened in reality. Airline personnel really, REALLY need education on laws AND behavior possibilities of any SD of ANY breed. Service Dogs are DOGS, not ROBOTS.

165) The cost impact most of us on disability incomes . I think that these regulations are needed . I do not believe therapy animals should be allowed unless fully trained by a certified trainer. The burden I see is that there is really no place for me and my service dog to sit comfortably and safely for the duration of a trip . I think that the policies the airlines have are important to protect the passengers and crew. I believe with responsible meetings on both sides there can be a fair resolution . I believe that there is a solution to ease the burden on both sides of the argument .

166) If I were to have to provide this 48 hours or more in advance of a flight.. how would i do that in the case of an emergency when vet clinics are not always open, or your preferred veterinarian in a multi vet practice may not be available.?

167) What good are my access rights if my dog and I keep getting attacked?

168) Right now it's getting to be more and more difficult to fly. I just bought a ticket for a vacation, and they ask you about seats. The seats that have enough room for my German Shepherd are about \$30-50 more each flight. Airlines always had seats available years ago for those with service dogs, but now most of those are gone unless you want to pay \$200 more on top of your airline ticket. My dog is extremely well behaved, and we have flown many times. There are more regulations you



can put in place to punish those that act up rather than making it more difficult for those individuals who have well trained dogs.

169) I don't mind providing proof of rabies as most states require animals to be up to date on the rabies vaccine. All other vaccinations are optional and should bare no weight on whether an accompanying animal, whether they are a service dog, psychiatric service dog, or emotional support animal, be permitted to fly. Requiring a veterinarian to sign off on an animal's expected behavior is faulty, while not something I have approached my veterinarian about, it's something I would question on whether the veterinarian would sign though due to liability reasons. The law, as written, is not poorly written, it is the airlines that have failed to enforce their own protections under the law that has allowed fake service animals, psychiatric service animals, and emotional support animals to become problematic. The airlines are pushing for tighter restrictions but if they had enforced their own protections as currently granted by the law there would be nowhere near the problems that we are seeing now. There should be a strong focus in training all airline personnel on the current law, if the law is changed there still needs to be the same focus on training airline personnel to understand the law and what protections are afforded to both the airline and the disabled passenger.

170) Airlines do not comprehend laws of service animals because they lump ptsd with emotional support animals when the law clearly states that a service animal has to be trained to preform tasks the person can not do. An emotional support animal does not need the same rigorous training as someone using a service animal

171) My partner and I have a PSD/Medical tasking SD and an ESA between us both. There are certain airlines we have blacklisted due to unfair treatment of our disabilities. While I think something needs to change in regards to ESAs flying (maybe requiring ESAs obtain a CGC) I think it's disgusting how people are treated with a task trained PSD. We will be watching the new airline laws closely and are not afraid of never using an airline again and going with Amtrak even if it means making the travel time longer.

172) I haven't flown in the last year and a half because of the



issues with access for my mobility dog. Airline personnel assume the worst. I have started taking the train instead of flying. There has to be a better answer.

I would like to clarify my answers relate to fully trained service dogs only. I do not believe ESAs should have the same access rights at all and would fully support additional paperwork requirements for ESAs.

173) We are all concerned about safety and unruly animals. But we are not the problem. I suggest that instead of making further barriers, the ACAA be amended with harsh monetary penalties if it is found AFTER an incident and resulting investigation, that a person misrepresented their animal as safe for public access. Heavily advertise the penalties. Make people confirm it when they book. This should help deter casual disability fakers looking to save a few bucks by upping the risk they feel.

Further, for emotional support canines only (not psych service dogs), it would be a good idea to partner with the AKC and require ESAs to have a Canine Good Citizen certificate. This would be proof, from a reputable third party, of minimum training achieved to behave in public. The tests are readily available in most areas. Please negotiate a reduced rate for low income fliers, and ability to send video of the dog completing a test for those in remote areas.

Finally, for non-canine ESAs, require that the animals fly in cargo if they can't fit in a carrier in the cabin. Require a carrier to accompany the handlers in the cabin if possible, only to be used if the non-canine becomes unruly.

Remember, whether handlers are faking a disability or not doesn't matter in terms of safety, as long as the animals behave. Please keep that in mind while policy making, as these rules can easily hang the guilty and innocent together. Thanks.

174) Proper service dogs are trained for many situations including flying. If your dog has never even heard the sound of a plane before i dont suggest flying with your animal

175) I think we need to crack down on the amount of untrained animals. How to do that I'm not sure but every animal, Service Dog or ESA, and person should be safe. If an animal is causing



a disruption the animal should be removed.

176) In the past, I have had difficulty reserving a bulkhead seat. I prefer this option so my service dog (large dog-golden retriever) has enough space. I think individuals pay for bulkhead who do NOT have a disability should be made aware that they may be relocated (and reimbursed) if a service dog or similar ends up on the same flight.

177) I think it is perfectly acceptable to ask for my general doctor's letter, veterinary health certificate, and even proof of training. I have flown with my service animal many times and do not mind providing these generic documents that I keep on hand. However, my last flight asked me to fill out their own airline paperwork, and that was truly a burden. I had to make doctor's appointments just for this paperwork. Upon arriving at the airport, this airline interrogated me and treated me as lesser because I have a psychiatric service animal. It did not matter that he has over 12 trained tasks and is with me 24/7. They treated us like he was an ESA. Please treat service animals with trained tasks AS service animals. Please protect our rights and privacy and time. ESA's are the ones that should be more regulated. Thank you for your consideration of our opinions.

178) My legitimate, task and obedience trained service dog has been nearly attacked by multiple emotional support animals in the airport. I would like to see ESAs more strictly regulated or even eliminated from the ACAA. The ACAA needs to be amended to not recognize certifications and ID cards available online as proof an animal is a service animal. Fully trained psychiatric service dogs also need to be recognized as equal to other service dogs, not emotional support animals. I have a mobility service dog, and while I would not like to have to get proof from a veterinarian that my dog can fly, I will do so if it will eliminate fake service dogs and ESAs.

179) PSDs and ESAs are completely different animals and the fact that PSDs are constantly bundled with ESAs is not only annoying but a hassle for PSD handlers. ESAs should be required to be held to the same training standard as service dogs if they are allowed to fly in the cabin with their owners.

180) My vet knows my dog has been training to be my service



dog since she was 7 months old. She will be 3 come June and I also carry a written prescription for my service dog from my doctor as well as a card with my trainer's info showing she is my service dog. In a few months my trainer will be helping me with working to help my dog succeed in the airport as well as the airplane

181) The biggest changes need the priority over ESA and Medical alert Service dogs. In this day in age anyone can get an ESA. And ESA is not the lifeline between life and death for a handler. However a lot of Trained Service Dogs are. When an airline representative tells you I'm sorry your Service Dog can not fly with due to size and the amount of ESAs on the flight and they typically only allow lap size dogs to fly in cabin. There needs to be a change. If I have to fly which I don't all that much after this incident. My Service dog and I should be accommodated just as much if not more than those with an ESA. My dog is an alert he accompanies me everywhere. And ESA is not supposed to accompany everywhere. My Dog is my life line. And if an airline can not accommodate us then why should I bother to give them my money

182) Veterinarians don't always know a dog is a service dog. They aren't at all qualified to say anything in regard to their behavior because they see them for a short amount of time and in a unique situation. Having all of these documentation requirements makes it not possible for someone to travel for sudden and unexpected things like deaths in the family, medical procedures, or any situation where they book a flight with less than two weeks to get all of the documentation. It is an undue burden to put on people with disabilities and having to pay all of the extra fees is a large burden most cannot afford.

183) ESA should be in crate the entire time. ESA animals should be in last row of airplane and far away from all certified SD. They should not be allowed to be front rows. ESA are not trained nor can they behave like SD.

184) I understand wanting more regulation, but as a passenger I would prefer something like rules to remove ill-mannered dogs or restrict ESA dogs rather than making it harder for me to travel. Add enough paperwork and I'd rather drive or take a train than deal with an airline. Flying is already difficult as a handler,



don't worsen it, improve it

185) Anytime I travel I also have to deal with explaining about my disability to airline personal, TSA, and other people involved with flying I either have been detained, treated like a total idiot, or ignored my requests. If the airlines request more information about me or my SD when flying I will go back to driving to my destination. The cost associated with flying is high enough, add to that the request to get proof of medical need or SD proof makes me wonder who would get this paperwork, who would be responsible to keep it safe, and if I have to hand over to the airline before my flight what assurance do I have that all parties would communicate and when I arrived I would have access?

186) Adding a health cert is ridiculous. No other animal flying in the cabin needs it. Vet record confirming vaccines, sure. That's a one time thing for each vaccine and doesn't require an appointment every time I fly. While dogs should be trained and accustomed to the environment I don't think any documentation would be fair to confirm this. A vet only sees the dog in a very isolated incidence and them certifying the behavior is pointless. Also. The dog doesn't have to be perfect. But it should be quiet, not urinating or defecating, and certainly not a risk to those around it. But as long as the dog minds it's business it is a non issue. Also question 2 does not warrant a yes or no response. I'm all for reducing people abusing the system but don't make it unfairly hard on those who actually need the system.

187) Extra paperwork for psychiatric service dogs is unnecessary. They're just as important as a diabetic dog or guide dog for blind people.

188) Traveling by air is already extremely stressful due to my mobility/pain disability and current airline regulations for all passengers. I don't mind carrying my service dog's health records with me but having to submit them ahead of time is asking too much. I am also against ESA's being allowed on flights without being crated as most are just pets who are totally untrained. I am forced to worry about the safety of my Service Dog. I recently had a conversation with a psychotherapist at an airport and we both agreed there are other alternatives for people who become anxious when flying.

189) My highly trained Service Dog has ever been an issue or a



problem when traveling. We have, however, encountered numerous other animals that clearly weren't well trained, behaved or controlled when we travel. It's clear that there are passengers who do not have the temperament or training of a proper handler.

190) Though the ACAA policies are different they need to be made aware of what constitutes a SD under the ADA, namely that they are trained for PUBLIC ACCESS. Since my (and many other people's) disabilities are invisible we put under undue & unfair scrutiny. Our dogs are not any less trained then seeing eye dogs. Also they need to focus on the *person* not the dog. I am a disabled person & my dog is a tool much like a walker, etc. Working dogs are easy to distinguish because they are used as such. We also don't carry fake "registration" papers as the ADA has no official registry. There are many ways to educate workers about SDs, but starting with the basics: look at the person first & their need for access, the dog is medical "equipment" necessary to help the disabled person be able to navigate the world in a way comparable to someone without a disability. This is not the complete picture, but it is a good starting point.

191) Untrained animals pose a serious risk to not only the safety of my service dog, but to my health. Those with ESA's supported by a legitimate doctors note should, at minimum, complet the AKC CGC or similar. In flying, they should be held to the same high standards as service dogs if they are going to be allowed to fly.

192) I have flown frequently with my service dog. It has been my experience that every time I must check into the airport for a flight, and every leg of my flight is a crap shoot. Employees of the airline and TSA personnel all have a wide range of knowledge, which is mostly lack of knowledge, regarding the laws for service dog travel. In addition, even though I call the special accessible assistance line several days prior to flying, more often than not, there are issues when I arrive at the airport. Most have no idea what a CRO is and because my legitimate service dog is not a lab or golden, I am often subject to more scrutiny despite my dog's impeccable public access skills. Once TSA begins screening, and they see my dog calmly going through the check, all is well. Flight attendants praise her excellent behavior.



I feel that dogs behaving badly, be it a dog presented as a service dog but I'll behaved or a comfort dog, with little training, do not belong on any flight. It does a huge disservice to those of us with legitimate service animals. It distracts and causes harm to ourselves and our service animals. The DOT needs to train all personnel on what a service dog looks like in their behavior. In addition, increased training for personnel which educates about the differences between service animals, therapy animals, comfort animals and information about how to spot a fake. It is often not that difficult. It is also important to ensure those with invisible disabilities are not unfairly regulated (such as Psychiatric Service Dogs). I do feel strongly that persons traveling with legitimate and well-trained service animals should not be subjected to greater regulation. I also feel that until those in charge, are better educated as to what to look for and when to say no. That is where the effort should go.

I understand that many people find the cost of a health certificate and the timeline for such are not fair. I like to have my dog checked in case my pup gets sick or injured on our trip. That is my choice. I do not think it should mandated but evidence of vaccines should be. There are times when there is a need for immediate travel and I don't have time to get a health check. I always carry proof of vaccination or titer waiver. That should be sufficient.

193) Due to the region in which I live as well as my disabilities, it would a cause substantial burdon as well as a significant amount of money for me to be able to fly with my service dog if I had to get a health screening and paperwork, etc, for my dog.

My service dog assists me with PTSD and other disabilities caused by the PTSD. Therefore he is a psychiatric service dog. I find it deplorable that my very well-trained animal who enables me to live my life normally through his various alerts, responses, and other trained tasks is lumped into being called an ESA by the ACAA and airline policies.

ESAs require no training. My dog has been training to assist me his entire life. I don't travel with my dog because planes make me nervous. I travel with my dog, as well as have him accompany me EVERYWHERE because I could not otherwise function. Thanks to his alerts and tasks, my disability is manageable and I can kili my life. There's a huge problem in implying my dog is not actually a service dog because my



disability is less physical than others.

194) For some of us, it involves our care givers also to help in the process.

195) We will not fly because we fear for the safety of my service dog.

196) I think that they need to require documentation for all flying with any type of sd or not require anything at all. Psychiatric service dogs should not be included with ESAs. ESAs should require a letter but ALL SD should be held to the same standard as far as documentation is concerned.

197) Every time I try to book a flight it's a problem. Either the airline asks for paperwork that doesn't exist (like certification) or, when I actually go to board they "loose" my accommodation for bulkhead seating. Having more hoops to jump through for my legitimate, task trained service dog will mean I fly less.

198) I don't believe untrained ESA should be allowed in the cabin unless they are crated or possibly muzzled with a basket muzzle (or similiar). My service dog has been attacked previously by an ESA. Thankfully, not while flying, but it is part of the reason I do not fly.

199) Ask for certificate of dog's training. Those lacking it have a fake service dog and are committing a misdemeanor or felony, depending on state.

200) I want to be able to catch a flight like everyone else and not be delayed by extra requirements just because of my disability. Traveling shouldn't have extra barriers.

201) I live on an island, so I have no choice but to fly when leaving the island. The island is rabies free, so I already have to get and maintain a lot of paperwork in order to return home.

202) With allotted time limit to get certifications that last for 6month or a year would be ok. But if a family emergency happens sometimes getting that information as quickly as needing to leave for a family member dying is not as easily. I personally carry records and my doctors notes with me majority of the time just incase.



203) Added time & cost will make flying far less likely. Fear of my trained assistance dog being attacked makes travel more stressful. Untrained ES Animals should be banned. Access for trained assistance dogs should be guaranteed.

204) For people living on fixed income, ex. disability, saving for a plane ticket is cost prohibitive enough. Having to get extra 'paperwork' for a working service dog, is costly as well. Not to mention how long the health certificates are good for after receiving them. It's a small window.

205) This survey is worded very biased.

206) Employees of airlines need to be educated about service animals.

207) Added veterinarian and doctor costs just to fly would be out of the question for me. I'm already on a fixed income and flying is expensive enough already. I wouldn't be able to afford to fly with any added expenses.

208) First - I am very appreciative that you are asking for input from service dog handlers. I realize the situation of pets in vests has become a critical issue and I'm happy that you are including service dog handlers s in the conversation.

I flew for the first time a few months ago on Southwest and it was an excellent experience. They let me board first, had me sit in the bulkhead and gave me time to get settled. It was a huge relief because I wasn't sure what to expect.

My biggest concern about the questioning process is the embarrassment of having to disclose my medical condition to strangers. I'm happy to confirm that he is a service dog and his purpose is to work as an alert dog, but nothing more. I know they are not supposed to ask about my condition when trying to verify his legitimacy but there is still quite a bit of confusion about the difference. I would like to see more training for all airline staff on what the differences are between a service dog and an emotional support animal and what they can and cannot discuss with the handlers. Needing a service dog is hard enough - being berated in public by uneducated airline staff is unacceptable.



The idea of needing some kind of medical clearance seems unrelated to the concept of how a dog will behave in a crowded situation or on a plane. A vet can document that a dog is healthy, but usually has no idea how they will react in a stressful situation. It seems this is a barrier designed to slow down those who are violating the intent of the service dog by making everyone go through additional steps. I'm guessing the idea is that if they are faking it they won't do the extra paperwork. But that puts the additional responsibilities and costs on those of us with legitimate service animals, without any kind of confirmation that it will solve the problem of out of control animals.

If requiring a veterinary certificate is the final decision it needs to have a timeline attached. Asking a handler to go to the vet for an updated form each time they fly could quickly become a significant financial burden. Another challenge would be those who need to fly on short notice and may not be able to get into the vet within a day or two. My vet usually books his appointments two weeks out and would not consider a "flight exam" to be an emergency.

I would be fine with being asked to show some kind of proof of behavior using the AKC Good Citizenship Test or the Public Access Test. However those tests can be cost prohibitive and require finding someone who is authorized to proctor the exams so owner certified exams would need to be accepted. Sadly it still wouldn't stop the pets in vests epidemic, but at least the fake service dog would be well behaved.

I would also be a supporter of the airlines requiring some kind of liability contract for anyone flying with an animal. While no dog can be 100% reliable at all times, the chances of a trained service dog attacking a passenger or other animal are much lower than a that of a pet. If it does happen the liability should rest with the owner, not the airlines

thank you!

209) I'm not confident at all that airline personnel are aware of the difference between my legitimate ADA covered service animal (hearing) and a non-ADA covered ESA. As a handler, I am regularly tested to make sure that I can handle my service dog out in public and must renew our license every 3 years to



maintain that privilege.

210) More opportunity for segregation & discrimination due to being disabled to occur. Difficult to get appointment with medical professional, vet, etc. - have to have interpreter so it takes even longer if you can find someone to interpret - can take up to 2 weeks to get interpreter. Would not be able to fly at all :(

211) I'm for emotional support animals being able to fly for free ONLY in a carrier

212) I am not any more concerned with another animal interfering with my Service Dog than I am other passengers interfering with him.

213) Get rid of access for Emotional Support Animals and make Psychiatric Service Dogs regular Service Dogs.

214) We are an Active Duty Army family with a daughter that has a severe form of epilepsy. Her dog literally saves her life. There are currently enough hoops to jump through. Flying is hard enough with a SD and all the expenses that accompany having a SD & it is discouraging how much it already is & adding more restrictions might cause access issues financially. We fly internationally

215) Most of the airport/airline employees are completely uneducated about what an actual service animal is and what the correct laws are pertaining to them

216) While health certificates are standard paperwork for all forms of travel, requiring extra forms from vet or Dr for service animals is absurd. The current requirement of doctor notes for psychiatric service animals is discrimination.

ESAs should be restrained and or contained in some effective manner or handled like other pets.

As a disabled human paired with a miniature horse for mobility assistance, I find my air travel almost eliminated, a sad change from my younger years traveling with my airline employed father.



With the problems caused by untrained and often unsocialized ESAs and uncaring or uneducated in air staff, I'm frankly afraid to expose my partner to such a dangerous mode of transportation, and the extra stress and expenses to clear my living medical equipment doesn't make us any safer.

217) I will not be treated like a second class citizen just because I'm disabled and I use a service dog.

218) Fakes are truly getting in the way. Also make them understand that certifications are not real/required.

219) Shots are mostly for tue dogs protection. I find that largely useless, and something pet owners need anyways, so it doesn't really differentiate them from a pet or SD.

AKC Canine Good Citizen test is \$25, and is a MUCH better indicator of a dogs ability to handle the stress and righorsof air travel.

We have apesp thousands of dollars, and years prepping to travel, and what largely holds us back is the fear of fake and untrained teams endangering our real SD.

220) I currently have a daughter living in Montana, whereas I live in Oklahoma. She is expecting a baby this summer and I need to fly with my SD to be there to help her family. Her due date is uncertain and may vary as much as weeks. How can I make reservations and fly there in an emergency if I have to obtain paperwork to submit ahead of time?This type of requirement would make it impossible! Please consider carefully the difficulties caused in such an event!

221) Psychiatric service dogs need to be treated as equals to mobility and medical alert service dogs. They are task trained to mitigate the handlers disability and should not be classified similar to ESA's

222) My service dog curls up and falls asleep the moment I sit down on a plane and has done so since his first flight. Every ESA I have come into contact with is not trained enough to be in public let alone on a plane. ESA's put my dogs safety and my own in jeopardy by being unruly and their owners not having control of them.

223) Over the summer I purchased a last minute ticket to fly to



another state the next day. If I had to provide current vet records and a current doctors note, I would not have been able to book a last minute flight.

224) ESA should have to be crated or muzzled when flying.. Unless they can prove they have passed at least a CGC(preferably a CGCU) or a public access test. I wouldn't mind having the same requirements for a service dog.

225) I struggle with how to train and accustom a dog to flying without actually flying. Also, I feel teams should be automatically sat in bulkhead or similar extra leg room seats for the comfort of the dog and passengers next to them. Also, if the flight is not full, the team should be given an empty seat next to them for the safety and comfort of the dog. Many dogs that preform guide and/or mobility work are going to be larger breeds and planes are extremely tight these days.

226) While nothing is going to keep me from traveling domestically and internationally with my service dog, it would indeed be a burden to have to get a health certificate for every domestic trip (especially short ones, like the one-night trip I recently took); getting the international veterinary paperwork done has been burden enough over the years! A doctor's letter is not necessary since doctors don't know if a dog is a service dog, emotional support pet, or regular pet. I do believe that the emotional support animal part should be either completely done away with or it should only allow small pets that are confined in a carrier at all times in both the airport and airplane, just like other pets many flights allow. Scientific research has shown that emotional support animals are not a necessity because inanimate objects, such as toys, give the same emotional support to people; multiple studies across the globe have confirmed this over the years.

227) If people can prevent ill behaved animals from flying, I believe it would make it easier for service dogs and ESAs to fly. I graduated college because I could fly with my dog back and forth between college, and because money was at a premium, the extra paperwork might make it more expensive. He was a shih tzu who wasn't task trained, but could easily handle making through security, a pat down, and then leaving service dog teams alone. He kept me company, got me out of my apartment regularly, and when I would have flashbacks or other hyper



vigilance symptoms, he would help calm me down and be able to sleep. I couldn't afford the 75 dollar pet fee to fly with him, and because of ESA laws, I got to keep him with me at college. He was small enough that a crate would've been possible, and that might have been a good compromise for him to be at my feet in a crate, although he did fine riding on my lap.

That said, I understand how ESAs are making it more difficult for legitimate service dogs to fly. I've flown with both service dogs and an ESA, and both were valuable. I think requiring a behavior certificate from a third party, whether that's a trainer, a vet, or someone else, would be a good step. Especially if it was free or relatively easy to obtain such a certificate. Even just taking a dog to a local animal shelter and having the staff test to make sure that the dog isn't dog reactive, at the very least.

228) Please do not lump Psych service dogs and ESA's together. Requiring different rules for only 1 type of service dog vs all the others is discrimination.

229) Please make the rules stronger so those that travel with legit SD are protected from those that are bringing untamed dogs on flights.

230) You have to crack down on those that abuse the law for their own gain. Laws without enforcement are worthless and won't help anything

231) Disabled people already have a difficult time traveling when you have to remember all of your medical supplies, etc. Then add in an important service dog and traveling gets more difficult. Adding all of these costs and burdens would be just that, a burden-financially, time wise, it would mean traveling around to get the forms and appointments, also, the wear and tear on the car, gas for car, etc. all of those listed make it a huge waste of resources, but the disabled already have less resources than those not disabled.

232) I am very concerned that the ACAA lumps ESAs and psychiatric service dogs together as one category separate from other service dogs. Psychiatric service dogs are NOT ESAs. Asking for a letter disclosing a mental health diagnosis for a service dog to fly is blatantly discriminatory when the airline does not ask the nature of any other type of disability.



Step 1 is for ACAA to properly categorize psych service dogs as trained service dogs the same way the ADA does. Perhaps ESAs should require training to fly. Requiring some proof of training on all dogs that fly is less discriminatory than requiring a person to disclose that they have a mental health diagnosis. I am also super concerned that since ESAs and psych service dogs are wrongly categorized as the same thing by ACAA that new legislation to ban ESAs could wind up banning psych service dogs as well. I have written to the representatives proposing these laws and have writing to the DOJ about my concerns.

233) staff should know the ada laws better. and also do not put a psd in the same group as a esa .

234) Requiring extra work would be a huge burden. Air travel is already expensive and the added expense would make it impossible. A veterinarian is not competent to assess behavior, that is not what they are trained for. Are other people required to have certificates proving that they will not be in distress from flying? I have been on planes where people do disruptive things, like threatening to open the door mid flight. Requiring more of people with disabilities is not the answer. Making it easier and less stressful for everyone would be a better solution. Airlines taking better care of pets and charging people without disabilities less would lead to less people “faking “. It is not right to impose greater restrictions and requirements on those of us less able to afford it. Better educating the airlines and the public is a better solution.

235) I had to go through a very elaborate process in order to bring my seizure alert dog on a cruise. If I hadn't already committed to going with my entire family, I would have just not gone, which is extremely unfortunate. I don't want to have the same, ridiculous circumstances on airlines as well because I enjoy traveling and I deserve the right to travel with my seizure alert dog without going through an insane verification process.

236) Veterinarians are not behaviorists and could not “guess” how an animal would behave on a plane based on a routine vet examination. That is the worst idea I've seen presented.

237) The importance of verifying training and temperament is completely overlooked in all aspects of the service dog world.



All service dogs should have to be evaluated by an ADI accredited organization and pass their public access test as well as a temperament test. I am on a Teenager Service Dog page and these kids know the law but have no problem with ethics issues as long as it falls in the law. For instance someone was just posting about their dog that has growled at a tall man and a running child. Their dog has never bit so they will be continuing PA even though several people said to pull from PA and work with a trainer. If people can't afford to work with a trainer or get these basic documents then a service dog should not be an option. Much like other medical equipment which is not affordable to many. If anything the right to have a service dog should come with basic requirements since others could be harmed. I also believe that with a doctors note and certification from ADI there should be a government ID given out. Much like a handicapped placard for the car. All of these things would make me feel much more comfortable taking my SD into public.

238) I think only services dogs should be allowed to fly, and never ESA. I think no other animals such as cats, pigs peacocks monkeys or spiders should fly in the cabin.

239) I am deaf and I'm having a hard time even getting information about the individual airlines' policy changes. I already have to deal with airline representatives repeatedly hanging up on my relay calls when I'm just trying to purchase a ticket. I can't imagine they'll be any more professional when I call to try and clarify these new policies.

Compared to the "general public" I have more trouble navigating airports and ensuring that I'm afforded equal communication access while traveling. For instance, if there's a problem with online scheduling or check-in I spend a disproportionate amount of time getting it sorted out compared to my hearing peers. In the past, I've resorted to having a hearing friend call airlines for me. She's able to accomplish in a matter of minutes what it takes me at least an hour to get resolved.

The air travel process is already a hugely difficult ordeal for many people with disabilities, these new policies just make it that much harder for us to get access to the same services everyone else takes for granted.



240) Unplanned, emergent travel would not be possible. Airline personnel need to be trained in the behaviors and actions of a trained service animal, be confident in the law and have the back up from their superiors when a person is attempting to fly with an untrained service animal.

241) I haven't encountered any real inconveniences in 8 years.

242) Airline staff absolutely MUST know the difference between ESAs and legitimate service dogs. ESAs should NOT be allowed to fly unless crated.

243) When flying with my service dog, there were 4 other dogs (not trained at ALL) on my flight. One was an ESA so no training is required, but the other three were wearing the scan "service dog IDs". They barked and lunged at my dog (who was sleeping) the entire flight.

244) I just recently (within the last week) flew with Delta airlines. While I had the appropriate paperwork from my veterinarian showing that the dog had all of her vaccinations, they tried to refuse the paper and not allow me on my flight because they wanted a signature from my vet. This paperwork did have my vets letterhead and contact information on it. It caused me extreme stress and to be late to board my flight. If these new policies are going to be changed to a new law, there needs to be a very specific outline of what type of paperwork for vaccinations that will be accepted.

245) My trained service dog trumps ANY ESA and we should NOT have to endure more red tape because of those people who feel entitled!!

246) Please start limiting access for esa animals on planes. I have a trained service dog, and I would hate to fly and have the issues with an unruly dog on a plane. I have heard plenty of stories from a friend who is a frequent flyer.

247) N/a

248) A vet will not sign a paper on an animals behavior, they are not a dog trainer or behaviorist. Requiring a person to then go to an animal or behaviorist to prove their dog is trained will cost at least another \$100 if they can find one that wants to test



the dog.

249) I'm worried about untrained pets that are being passed off as "ESA"s harming my service dog. ESA should have more paperwork to fly and should have training as well. Service Dogs should have less hoops to jump through to fly. It's obvious the difference between ESA and a Service dog, anyone at a gate could tell a well behaved Service Dog against a pet/ESA.

250) I think it is important to weed out fake service dogs. I was once at a Weight Watchers meeting when someone's fake as but another customer. One of the problems with adding more requirements to fly though is that it hits disabled people disproportionately hard. We often don't have the energy to traipse around getting paper work. Maybe a one-time submission?

251) I don't think a doctor's letter or veterinary certificate would help the problem. I think that handler's should have to provide credible training assurances. I carry my trainer's contact information with me and a copy of my service dog's Public Access Test.

252) It costs enough to fly as it is, and extra expenses for a disabled person traveling with a trained service dog should not be added. Most disabled people live on a fixed income. For some it is very low.

253) you Do not have to choose between protecting disability access vs discouragingly fakes. This isn't that hard. Just use the ADS guidelines. Stop reinventing the wheel. This whole thing is stupid.

254) The second question really is more of a maybe. Yes the disabled person and their dog should be protected, but there should be a balance between that and the protection of the public against untrained pets having access.

255) Registries are crap, do not let those lying harpies continue profiting by "certifying" fake SDs. The best test of the validity and ability of a SD is the owner's knowledge of the law and their comportment before the flight. We already carry shot records. Enforce the ADA, restrict ACAA ESAs to crates.



256) My biggest concern is untrained ESAs next is staff that don't know how to handle SDs. I have no problem needing a AKC CGC test needed but requiring a retest or anything like that every time I fly would be a BIG turn off. Health certificate are easy to get and I have no problem providing, thou it is an extra cost and maybe hard for some people. A Vet can not tell animal behavior. That is a job for a dog trainer or behaviorist.

257) I don't have health insurance currently so I can't see a doctor to get notes. My vet I think would very easily sign off on paperwork saying my dog is healthy but if it specifically says it's for like proof of a service dog I don't think they would due to that liability if I were lying or something was to happen. Also the vet is not qualified to sign off on if my dog will behave in an airport, she has not seen my dog in public other than her office in which she is nervous and she behaves perfectly in general public.

258) Health certificates are not undue burden. Totally acceptable.

259) I am a vet tech. My vet completely disagrees with forcing her to sign if the dog is well behaved. Dogs don't act the same way in public or at home compared to the vet. She only sees these dogs for 20-40 minutes

260) Fakers need to be stopped but not at the expense of people with disabilities that need their service dog. Travelling is stressful enough don't make it harder.

261) I support bringing the ACAA in line with the ADA and permitting only trained Service Animals, not emotional support pets. ESAs are not allowed in other public settings because they require no training and generally don't have any training, and it makes no sense that they are permitted in as stressful and enclosed an environment as an airplane.

262) I believe that problems should be addressed on a case by case basis, and if there is a problem with a certain animal, THEY should be restricted, and not everyone else.

Living with a disability is difficult enough without extra regulations and expense involved in carrying out a simple life activity such as travel (which healthy folks take for granted).



Also, when people acquire a disability, they often lose their regular source of income and are living on reduced funds. Extra expenses such as those proposed may prohibit travel for many people with disabilities who depend upon their Service Animals.

263) It is difficult enough to be disabled, and even more difficult to need service equipment (including a Service Dog)... without having to defend myself and my SD from the public and from gaining access to things that normally-abled people use daily without thought. Please make access easier, instead of installing more regulations to add even more difficulty to an already overwhelming situation.

264) Its discrimination that i have to jump through so many hoops, including a letter from my treating physician on why i need my animal and to have that letter updated yearly. Its also discouraging that people that have no disabilities can get such a letter and fly with their untrained animal. Just because they dont want fluffy to fly in cargo.

Their has to be a better way of determining whether its a real service animal or an ESA... i also believe ESA who fly should be trained basic obedience and be potty trained 100% And be non aggressive towards people or other animals like a service dog is trained.

265) The prices for health certificates, not everyone can afford them; especially if you're on a fixed income like myself.

266) Too much regulation will only make things worse

267) I think the policies are creating a lot of stress for people because the rules vary among airline companies and among disability/service dog type. I understand the reasoning behind having ESAs prove their actually assisting with a mental disability but thinknit is unfair to categorize PSDs differently than SDs. Both are service dogs who are highly trained to mitigate disabilities.

268) Why are the restrictions on the disabled person...why are we not punishing the abusers

269) Those of us with service animals are already looked down on in the community in many situations so it would be nice if people could stop making flying more difficult ad it is already



stressful on us

270) In my experience with flying, staff doesn't seem to know the difference between ESAs and Service Animals. I feel that more education is probably in order.

271) All these answers depend on the amount of trips the service animal has taken. An animal in training will be different than a seasoned animal but still needs the training time all the same. A vet might think a dog will perform perfectly well on a plane but in all honesty he has no way of knowing for sure because things happen

272) If you make a policy that applies to 1 person, it needs to be applied to every person flying.

273) I have a service dog. I have and will continue to invest in her training and get bills. The additional cost is a part of my responsibility. If someone is upset over the time and cost, possibly they're not true service dogs. You don't just have a dog and take him with you because you want too. There is a responsibility as an owner to train and handle the dog responsibly if it is going to be around other people, dogs and in stressful circumstances. I would say those who need the dog don't have a problem providing what is necessary to accommodate safety for all.

274) It shouldn't be harder for disabled people to fly. It's hard enough being disabled as it is. Enforce the laws already in place and kick out unruly dogs.

275) I've flown numerous times with my Service Dog. Sometimes all is smooth. Other times, often on the return flight on the SAME airline I have trouble with gate attendants or flight attendants suddenly deciding he won't fit under the seat. He fits on the way.... do they REALLY think he massively grew over a 3 day weekend when he's 7 years old?

276) The ACAAA needs to align their definition of a service animal to that of the ADA. ESA should not have access to fly. They are not trained to handle the environment.

277) Forcing disabled individuals to jump through hoops to bring their medical equipment on airplanes is blatant



discrimination.

278) The abuse of individuals who claim their dog is a service dog or take their dog out of their carrier during flight, adds another level of stress and burden to those of us who are truly disabled and require our certified service dogs to function in a public environment.

279) Do not group Psychiatric Service dogs and ESAs together. Use the ADA SD standards for dogs. Stop calling them service animals. ESAs and psych SDs are different!

280) My vet doesn't think their liability coverage allows them to make claims about whether an animal would behave on an airplane. It's an unreasonable shift of liability to vets, who only see their patients in the confines of the exam room.

281) Psychiatric service dogs are the same as seeing eye dogs. Classifying them with an ESA is wrong and is a burden. ESAs SHOULD have more documentation but you're discriminating based on the type of disability which is wrong.

282) I am a long time service dog handler, I have had multiple service dogs attacked in the airport by untrained dogs so I understand concerns. However requiring me as a handler of a trained service dog to provide additional documentation would likely cost me several hundred dollars a year which would make it financially non viable for me to fly. This would limit not only work related opportunities but also family and medical obligations. I am absolutely sure that my vet would not be willing to sign off on any sort of temperament/training evaluation for my service dog to fly because the question came up at our last visit.

283) You are discriminating against us just because we have a disability. If I had an oxygen tank or a wheelchair would you ask me for all this documentation? What about small children who might disrupt a flight? Do they need a note from their Dr saying they will behave?

284) Travelers should be able to provide training. Is a certified program and not just from someone online.

285) What I don't understand is how most airlines classify



psychiatric service dogs as ESA's. ESA's have no training where as a psychiatric service dogs have just as much training as any other type of service dog . Airlines should not allow comfort dogs ESA's or any other untrained animal on board an airplane.

286) There are many untrained ESA's and "fake" SD's that could interfere with people who need their animals. Something needs to be changed. Because of all the untrained animals I am worried about flying with my SD. Not because he wouldn't behave but because I don't want to risk him being hurt by an aggressive animal. I have been to the airport recently and have seen tons of dogs everywhere, barking at people and each other and all around showing stressed and aggressive behavior. Esa's Should be crated till on the flight in my opinion as they don't have any training requirements and it's honestly a liability. Service dogs HAVE to be trained to be a SD so theoretically there shouldn't be an issue with true SD's.

287) Twice I've had to travel with less than 24 hours notice for a death or end of life choice. I would have to decline if vet paperwork was required for my task trained service dog.

288) I travel with a German Shepherd as my medical assistance dog. Many times airline accommodations are made with smaller dogs in mind. Large dogs should be well accomodated. Also, every airport should have a place for dogs to eliminate close to plane exits. There's no bathroom for them on the plane and they've waited too long to make use of a restroom on the otherside of the airport if one even exists at all.

289) As a professional trainer as well as a PTSD service dog handler, I would think asking for training records or proof of training would be beneficial before allowing a dog uncrated or unmuzzled in the plane

290) I think it's a shame that it may come to this but everyone should be safe while flying.

291) Do away with ESAs completely

292) A service animal is totally different than that of an Emotional Support Animal. They should not have the same privileges. I have a Service Dog, and I'm spending hundreds of



dollars on training alone, let alone vetting and care. I work daily on training in all sorts of situations like busy buildings. I have to so that I have a dog that can handle that kind of thing. An emotional support animal needs no training at all so could absolutely cause havoc on flights. They should not be allowed to roam free or even leashed in a small cabin of a plane.

293) Ideally, because of my disability, I need accommodation to make flying with a disability and with a service animal easier while still protecting my team from fake service teams/pets or temperamental emotional support animals that could completely destroy my dog's working career. I am heartbroken to see stressed or untrained animals badly harming the general public, while my animal has been trained over the span of about 1,000 hours regarding how to act appropriately in public. Real service teams do not need discrimination about what their disability is. We need the rigorous training our dogs have been through to be recognizable, recorded, and measured to eliminate abuse of these laws from people with untrained animals who intend to take advantage of a broken law. It is not a veterinarian's job to recognize or assess dog training. Please do not make things more difficult for the disabled because of those who have no respect for a true service animal. Keep the public and our dogs safe by ensuring that emotional support animal also either need training or should not have access to the general public.

294) It would like to see the ESA designation discontinued... if a dog is for a psychiatric disorder then the owner should pay to have it trained and take the appropriate amount of time to train w the dog. PTSD Service Dogs are not ESA's.

295) Please regulate somehow. Fakes and untrained ESAs make it so dangerous for people like me to travel. My SD is for blood pressure alert and she missed an alert in an airport because an ESA or fake service dog tried to attack and bite her. I wasn't seriously injured, but I'm now scared to fly alone.

296) Making sure airlines understand that ID cards/certifications/registration does NOT serve as proof of legitimacy under the ADA. Also making sure animals are not disruptive (Barking/aggression/defecating) in airports or on flights.

297) I was flying with my psychiatric service dog. My dog does



medical alerts and mobility work as well but I consider him mostly psychiatric since I have a letter from my mental health doctor. The airline I originally booked a ticket with just started requiring veterinary paperwork. I was flying back home from a different state and all my veterinarians were back home and they would not sign the papers over the phone. I had to search veterinarians in the small town I was living in and had 5 days to submit the paperwork. Most of the veterinarians were unsure about the new process and did not want to sign the paperwork. I finally found a veterinarian who said he would sign the paperwork but during the appointment he refused to do so. He said the wording "dog does not pose a safety risk to the public" scared him and since he just met my dog that day he did not want to be responsible if my dog harmed someone. He wanted my dog to be evaluated by his trainer. The trainer, vet and my schedule did not work out well and could not find a time to meet as I am a busy college student. I would have to skip class to meet with the trainer and vet. I had already had to pay for the vet appointment (not cheap) and would also have to pay for the trainer. The trainer cost the same amount as buying another flight ticket so I bought one that did not require the vet paperwork. This whole process was very stressful and caused my medical issues to act up. The flight agents on the phone were not helpful as the policy was new. Thankfully all went well during the flight. After I bought the new ticket I found out that the airline changed its wording on their policy (literally the day after the vet appointment) but it was already too late for me I just went with a different airline.

298) THERE ARE ELEMENTS OF TRAVEL THAT ARE NOT POSSIBLE TO PREPARE FOR WITHOUT, ACTUALLY, TRAVELLING. I TEACH OPERATING AUTOMATIC, AND PUSH PAD DOORS, WHERE THEY EXIST. THE SAME, WITH ELEVATORS, AND WHEELCHAIR LIFTS. YOU CAN ONLY PRACTICE TAKEOFFS, AND LANDINGS, BY GETTING ON A PLANE. AS A TRAINER, AND A DISABLED PERSON, I HAVE TO DO MY BEST, TO TRAIN FOR PUBLIC LIFE, AND, I HAVE TO PREPARE TO HANDLE IT, WHEN THINGS DON'T GO ACCORDING TO PLAN. FOR ME, THIS MEANS BRINGING A MUZZLE, IN CASE MY DOG IS OVERWHELMED BY THE ENVIRONMENT, AND BRINGING CLEAN-UP MATERIALS, IN CASE OF AN UNEXPECTED PHYSICAL REACTION. I'VE NEVER NEEDED EITHER, BUT, I *AM* RESPONSIBLE FOR MY PARTNER. UNFORTUNATELY, WE HAVE BEEN



ATTACKED, BY UNTRAINED PETS, MASQUERADING AS SERVICE DOGS, AND, WE HAVE BEEN ACCOSTED, BY THE UNFRIENDLY PUBLIC. WE WOULD LIKE TO BE SAFER, BUT, I'M CONCERNED, THAT "PROVING" OUR PARTNERSHIP, WILL MAKE OUR TRAVELS HARDER, NOT EASIER. TO MY KNOWLEDGE, NOBODY HAS EVER HELD OUR ATTACKERS ACCOUNTABLE, FOR THEIR ACTIONS. IT WOULD BE GREAT, IF THERE WAS A CONSEQUENCE, FOR MISBEHAVIOR. A CONSEQUENCE SEVERE ENOUGH TO DISSUADE THE NEXT PRETENDERS, FROM TAKING THE RISK. FORCING US TO GO FROM OFFICE, TO OFFICE, TO "PROVE" OUR SKILL, IS LIKELY TO MAKE OUR LIFE HARDER, AND COST US MONEY THAT WE CAN ILL AFFORD. I DOUBT MOST DOCTORS, OR VETS, WANT THE ADDED RESPONSIBILITY, OF DECIDING "WHO IS", AND "WHO AIN'T. "

299) Our service dogs are getting attacked

300) Due to multiple disabilities which can range daily on there level of debilitating aspects I feel that I would have many issues making multiple doctors and veterinarian appointments before flights especially if it was a last minute flight due to health issues or death.

301) When you make it difficult for citizens with disabilities to bring their medical equipment (including service dogs) onto flights, you make it difficult for people with disabilities to have normal lives. My suggestion is to follow the ADA and if any animal is acting aggressive, out of control, or urinating and defecating (like a service dog should not) they should be asked to leave.

302) If i take time off work to go to the vet with researched info to ask the vet to write and sign so many vets will be afraid to sign in light of people being sue happy and go after vets that sign the paper.

303) All rulings need to be concise and easily understood!

304) It would be a heavy burden, financially, emotionally and physically if I don't have ready access to purchasing airline tickets and getting on a flight as and when I need to. It would impact my business/income, my health if I have to spend



additional time and effort prior to taking s flight, and my ability to function independently and contribute positively to community and society.

305) Disabled people have enough trouble getting doctors to print paperwork on time, and a veterinarian has a limited scope of an animals outside behaviour so I don't think they would make very good judges of training.

306) It has become so complicated to fly with a service animal I will no longer fly at all.

307) Emotional support animals are not service animals. They require no training. I have had my Mobility Assistance Great Dane Attacked by an ESA. The ADA laws already state that ESAs dont have public access. Proving my dog healthy isn't a problem I am fine with that. But people faking the service animals are a problem. I shouldn't have to answer questions about my disability in order to travel.

308) Emotional support animals need to be banned from flying.

Psychiatric service dogs ARE NOT EMOTIONAL SUPPORT ANIMALS. They are legitimate service dogs covered under ADA.

Staff needs to get the training and enforce the laws by banning animals not trained, not housebroken, and not on leash. Also anyone with a huge dog needs to approve seating ahead of time.

My service dog is small and is an excellent flyer. I worry someone's fake pet is going to ruin our hard work.

309) Getting a note from my doctor not only puts stress on me but on my body. All the time and effort I have to put into it because I need to fly? Is unreasonable. Last minute things happen, how do you expect me (disabled person) to run and get paper work just so I can fly with my service animal??

310) Stop lumping PSDs and ESAs together. This is discriminatory towards those with psychiatric disabilities.

311) Having tighter or more descriptive regulations actually



does protect access for everyone. Because the laws are so loose, it is causing those of us with actual disabilities to be turned away from stores, approached with skepticism, or harassed. If the laws weren't so frequently bent, we wouldn't have to spend every day defending our right to have life saving medical equipment.

312) When I'm in grad school, I won't have a choice on what's booked for (non-negotiable) conferences and I won't have free time. If I cannot be reliable because my service dog cannot come with me to help with the crowds, then I will just get kicked out of grad for my disability again.

313) I recently had an incident where a woman tried to pass off her emotional support animal as a service dog. It lunged over my mother's legs and bit my dog in the face. Nothing was done by the airlines or the DOT when I submitted the report. Veterinary costs for the injury were paid by me as the airlines won't give me owners info

314) It is incredibly discriminatory to require one disability to prove that they are disabled and so require the use of a service dog and not others. By law in order to have a service dog one must by law be disabled. If you are going to require a note for one, require a note from all. It is also wrong to require one type of service dog user to reveal to airport personnel the type or nature of their disability and not others. Airport and airplane personnel should be better educated about what a legitimate service dog looks like and, if the status of a service dog is in question, trained to ask the 2 questions permitted by the ADA (is your dog a service dog required because of a disability, what tasks is your dog trained to perform). Fake service dogs are a problem but I feel like the fake and untrained ESA epidemic is a bigger problem. The ACAA should require ESA's to be dogs only and eliminate the animal aspect of what will be permitted on a plane. The ADA has already done this. ESA's should also be required to have some level of training in order to fly outside of a carrier inside the cabin of a plane and be held financially responsible should their dog harm another passenger or another animal.

315) I understand the need to prevent service dog imposters, but as a person with a real disability that is invisible to the eye and a "real" service dog, the biggest challenge I face is



discrimination and an uneducated public.

316) Emotional support dogs are not service dogs. Service dogs do not require paperwork.

317) I have had the opportunity to fly multiple times this year (for vacations, visits, etc) and have turned them all down due to fears about how I and my service dog will be treated. I would rather deal with a days worth of train travel than take a 3 hour flight.

318) Just stop making it so hard I just a flight in peace without all the paperwork

319) There needs to be a larger, accessible door/isle located near bulk head seating where there is extra space needed for those traveling with a disability and/or with their service dog and there needs to be a lock down system in the floor of that area so people who are not able to transfer can remain in their chairs. This will eliminate mishandling of people with disabilities as well as damage to or loss of their chairs, that are their legs, in baggage.

320) I fly with my expensive and certified service dog all the time. I would like to see stiff enforcement of people who have these fake service dogs or ESA. It seems anyone can get a stupid letter from their therapist giving them rights to a ESA on flights. These animals are not well trained and often create a big issue with my well mannered service dog.

321) I would no longer be able to fly on short term notice or purchase a ticket at the airport like every other person can... Basically making me a 2nd class citizen....

322) My personal opinion as a person who has a service dog is that all service dogs should be allowed on flights due to their necessity and in-depth training to behave in public. However, I believe the biggest problem lies with the emotional support animals because they are not required to have any training whatsoever. I would say that in order to have ESA animals on the flight, they must either be in a cage or have proof that they have undergone the extensive training like a service do and will behave themselves on the flight. That way Everyone who needs their animals will be able to have them as long as they are well



behaved.

323) I'm a college student, and sometimes I need to make emergency flights to go back home with my family. How can I do that when I have to spend hundreds of dollars and hours of my time just so I can travel like any other citizen? I have a trained service dog, not 50 carry on bags.

324) Requires myself to take time off much need work, puts unnecessary stress on my disability, and puts my service dog at risk because he is labeled as an inferior "psychological service dog" under the same treatment as ESAs. He is a SERVICE DOG, not the same as an ESA just because of his tasks not being mobility

325) Often airline staff are not well versed in laws & procedures, nor do they remove/deny animals that are not under control and pose a threat.

326) The extra restrictions on a psychiatric service dog (not an emotional support animal aka glorified pet) that has been trained the same as a service dog for any other type of disability are blatant discrimination and make it much harder for people to fly, especially on short notice such as for an emergency such as death in the family. The added costs simply for being disabled and having a certain type of medical equipment also are ridiculous. Airlines etc don't charge more for an O2 tank, a cane, or a wheelchair. The passenger isn't required to spend excess time and money for documentation to bring them on board. Stop harassing service dog handlers, especially if their dog is obviously under control.

327) Traveling with an ESA requires planning. In cases of emergency, it's important that airlines work with us when time is critical.

328) I doubt I will have the room to type everything I would like to say, so I'll keep it as brief as I can.

I am a SD trainer. (I also have my own SD, but that's a different rant.) The short version of my job is that I train dogs, fly them to their handlers and then work with the team until they're solid.

When I fly with a dog, I notify the person I'm booking with. I



check in at the desk instead of the kiosk. I have current vaccination letters and other paperwork ready to show. Every single person I've done this with has looked utterly confused. I've been told, "You don't need to do this, just go." I may not need to, but I should HAVE to.

Proof of current vaccines to fly? That's a no-brainer. You want a nonvaccinated dog to bite someone on an airplane? Being disabled doesn't give you the right to put other people at risk. Also, if I have to have a health certificate for a dog to ship it cargo, why shouldn't I have to in order for it to fly with me? The business I work for includes 6 veterinarians. Health certificates just aren't that great for showing much of anything but current rabies. I'm not arguing for the need for them to fly, but current vaccinations should be a must.

Also, the first time any of my dogs sees an airplane is on that flight because there are so few airports/airlines that allow any sort of pre-flight training opportunities. If a dog travels well in a car or bus, that's great, but it's not an airplane. It's not the crowded airport with tons of stressed out people trying to get to their flights.

Giving trainers and handlers access to properly prepare the dogs would be amazing. Then they could simply choose to "test" at the end of the training session and get a pass/fail, thereby allowing them to fly or not fly in the future. It doesn't need to be some in-depth thing.

1. Was the dog responsive to commands from the handler?
2. Was the dog aggressive?
3. Did the dog void its bladder on the plane?
4. Did the dog appear to be in physical distress?

Problem solved with a great program to aid PR for the airlines (Imagine those cute pictures in the headlines!) and a lot less stressed out people.

329) I think you should focus more on making strict policy on service animals. I honestly don't feel like it's anyone's business what my doctor says about my disability and I have a hard time believing that a vet will sign a piece of paper saying any dog will behave. Animals can be unpredictable even professionally trained service animals can have bad days. What gives you the right to invade my privacy and demand a letter from my



physician defining my need for a service animal or the nature of my disability. It's no one's business but mine. The way the laws are set up now yes there are way too many fakes who endanger teams that are legit. However there needs to be a middle ground to have an acceptable solution. Allowing every nutter that says it's a service animal on a plane obviously isn't working however neither is getting my medical information. So there really does need to be a middle ground there.

330) I think psychiatric service dogs should not require additional paperwork and that many folks seem to confuse ESAs and PSDs. I am just fine with ESAs having some additional paperwork.

331) I would be willing to get a one time doctor note confirming my need for a service dog (SD) or Emotional service animal (ESA). I would be willing to submit that at the time I purchase my ticket. (I would prefer to only have to submit it once per airline and then they add it to my profile.) I would be willing to go through a basic obedience and SD/ESA certification process. For example- the State of Ohio has identified people who can watch you work with your dog and certify the dog's behavior meets minimum criteria for a service dog. I would be willing to produce documentation of my dog's vaccination OR antibody titer records. I would be willing to a requirement to prove rabies vaccination is current. All of these things would also help protect my dog and other travelers from "fake" SD/ESA. I do NOT want the regulations to require other vaccinations, as each owner should be allowed to determine which vaccinations are appropriate for their dog with their veterinarian. I do NOT want to be required to get a veterinarian health type certificate within so many days of my flight. If the certificate had to be within 45 days or less of travel, I travel so frequently that I'd be at my vet's office every month asking for a new certificate. If the vet certificate could be good for a year, that might be OK since a service dog should have at least a yearly exam. Since I fly for work, they pay for my airline ticket but would not pay for vet fees. I do NOT want added language about "accustomed" to flying as that would create a catch 22. When self-training my service dog, I called several area airports to ask if any would let me go thru security (even early morning or late evening when they might be less busy), so I could have a training experience. None would allow it. How is someone supposed to get their dog accustomed to flying if there is no



way to have access to that environment? How could anyone prove their dog has been accustomed to a flight without having ever been on one? I could see airlines asking for proof that your dog has been on x number of previous flights, but how could I be allowed on my first flight with a new dog if he/she needs proof of an experience flying? This would be an almost impossible barrier to flying with my SD or ESA.

332) While I sincerely hope cutting down on fake service dogs is doable, it is not fair to put the burden of fake SDs onto those of us with real SDs. Maybe there could be a kiosk at the airport to do a quick 45 second assessment or a fine for SDs who misbehave enough to cause (stress or damage)?

333) I have had both pleasant and unpleasant experiences using air travel accompanied by a service animal. As a service animal user, I feel that allowing untrained/unsocialized animals in the cabin butts legitimate teams at risk.

334) The discounted seats discriminate against disabled persons who cannot afford the more expensive seat but need the space for our medical equipment!! Also we must board first to get our dogs safely boarded and settled before others board

335) SD give people Independence and freedom. Don't let changes to policies take that away for disabled travelers.

336) It seems a lot of the problems have been with ESA, not Service Dogs.

337) Leave trained Service dogs alone, but scrap the ESA's. They're too unpredictable and too much of a problem.

338) My vet cost for a letter is low because she is already very familiar with my dog. If it required a visit it would go up dramatically. As these letters are more often required, the time and cost will increase. Some vets may opt out completely due to concern over liability. Vets provide health care, not behavioral evaluation. She can certify if my dog is healthy enough to fly but not how it will behave. Just how do I test my service dog in a plane until I'm in one?

339) I dont understand why I'm being treated as a second class citizen. I feel my rights have been taken away from me.



340) I believe all airlines should be having the same policies for going and returning flights. Delta and south western are not on the same page going and returning flights at all! Delta, you call ahead, have your papers then sit you as far away from everyone. On return, the steward don't like how the drs letter is written and won't let you board. I have a large service dog. Last seat, no leg room and she sat on my lap. Big boxer!!! For 3 hours!!!!!!

341) Treating visible disability service dogs and invisible disability service dogs differently is disgraceful. I have a service dog for a psychiatric disability. He is NOT an ESA dog. Airlines need to understand that hidden disabilities are difficult enough without having to jump through extra hoops. Yes there are people to take advantage of the law, but there always will be. Punishing a service dog owner with extra fees, more paperwork, and a general suspicion they are cheating the system is cruel and unfair. It is no different than profiling by race.

342) Weddings, funerals, Dr. appointments, family visits and emergencies, vacations; any needed traveling is hindered or stopped because of discrimination. And in psychiatric cases, triggers episodes and sadly affects lives.

343) The stress and act of flying/ traveling is already worse persons with a disability, why would DOT even consider discriminating and making this worse!? For some travelers, that's why they they have a Service or ESA dog! Plus the added cost of a vet check, when we already know our animal is up to date on everything! The time off work, or arranging a ride for those that can't drive, it all adds up to unfair discrimination against persons with disabilities.

344) I believe ESA should have to prove that their dog is accustomed to public environments

345) While I understand the need to stop "fake" animals being allowed to fly, it is an undue burden to have to provide "documentation" to prove that my SD is real. Anyone who has a clue can see that not only is she highly trained, but she provides mobility services for me. That, and that alone should be the acceptance criterion, just like ADA. I have spent a ton of money



training and caring for my SD. She takes good care of me, so I take good care of her. By the way, we have service dog certification from The Wounded Warriors Project, AKC Good Canine Citizen certification and we are certified as a Therapy Dog Team through Bright and Beautiful.

346) Yes, service dog fraud is a HUGE problem and needs to be addressed, but disabled people still need to be able to access their accommodation(s) (wheelchairs, canes, service dogs, pacemakers, etc.) without a lot of fuss.

This is why I'm hoping the United States begins to have an official service dog certification process like we're seeing in other countries. Obviously precautions will need to be made to accommodate owner-trainers, non-visible disabilities, and the like, but I think it will prevent service fraud and make life easier for service dog handlers overall.

347) Some persons with disabilities have problems getting all of this extra paper etc.

348) The closest airport is over an hour away, if I have to turn in paperwork before the flight, that's MORE cost, time, and travel I have to undertake, and I don't drive due to my disability. I'm assuming that this paperwork can't be turned in hours in advance, but must be days in advance, that means I'd have to take a taxi, both ways, which isn't cheap. Flying is a luxury not a requirement. I can get around without flying, if I'm going to have to jump through even more hoops now than ever.

349) You are killing us.

350) You are inhuman

351) Animals should be trained for this kind of work, ESA are not service dogs and should not be on planes. Psychiatric service dogs do very different work. People have to disclose their disability to get state and federal funding, handicap parking tags, etc. why are we not working harder to ensure not only ADA, but also decreasing the ease with which people are impersonating a person with a disability?

352) As I would be flying into the US from Canada, if US regulations/practices/policies are not communicated properly to



airline, airport, and customs personnel, I believe I would face extra questions regarding any service animal or ESA I would fly with. My disability affects communication. Having to deal with multiple sets of personnel, who may not understand service animal/ESA-related rights and laws, would tax my communication issues even further. DOT, airline, and ACAA regulations and practices affect citizens of multiple nations. All must be on the same page and have staff trained appropriately regarding service animals and ESAs.

353) Something that could be obtained by visiting a doctor might be okay but it should not have to be renewed. Adopting a 'dog only' policy similar to current ADA standards would be good, no one needs their emotional support kangaroo in an airplane passenger cabin.

354) The current regulations are unacceptable, there needs to be no more ESAs, no need to travel with them. People live without them everywhere else, or at the bare minimum make esa travel in carriers too if they need them that much wherever they're going. It is getting out of hand and it's a mockery of real service dogs. I understand not everyone feels the same way, and that's OK; but this is my opinion. Psychiatric service dogs, hearing, guide, mobility, etc. are all acceptable, but the dog should be TRAINED.

355) Psychiatric service dogs should not be treated like emotional support animals. PSD's are task trained and are legitimately service dogs.

356) The extra stress of having to run around and get approved just to fly.

357) If i had to fly out due to an emergency, i do not have reliable transportation or extra funds to travel to and frm vet on a last minute request. Currently we use an animal clinic that travels to our area and they do not give out "health certificates". We also do not vaccinate after age 6 and now use titer results as verification for immunity to diseases. Is this acceptable?

358) Because I am disabled, it takes a lot more for me to get out of the house and go to the vet. Something that may take only an hour or two and a phone call or two can take me several days to accomplish because I have to break everything down in



very small increments. My resources to get things done are very limited so getting a vet appointment in and making phone calls to be able to travel means I am going to have to give up things somewhere else. That always means sacrificing something in my standard routine such as health care or meals, or having to take more medication. There is no such thing as "just" a letter from the vet. It impacts everything in my life for several days.

359) ESAs and PSDs absolutely need to be in different categories!

360) Punishing the disabled because people can't follow rules is unfair, but ensuring the safety of everybody must be top priority.

361) Invisible disabilities that require use of a service dog should not be required to provide more proof than those whose disability is visibly apparent just because so many people misuse the ESA and SD laws on aircraft.

362) With the proposed new policies, I would have to take time off of work and risk losing my job to do so to get the necessary paper work. Getting my dog vetted is difficult and expensive enough. Having to go get paperwork and extra vet checks would have a huge financial burden.

363) My psychiatric service dog is still a service dog. Why do I have to provide paperwork when other handlers don't?

364) We need regulation on service animals of all types. They need to be trained in at least basic obedience and certified about public interactions. People need to have a doctor's letter about their need for a service animal. I'm sick of folks who lie to keep their untrained animals in public spaces. They are dangers to my trained and certified service animal.

365) Psychiatric disability is so incredibly stigmatized, and the extra requirements for psychiatric service dogs uphold and reinforce that stigma through overt discrimination. It's the only area where I can be legally discriminated against for having PTSD. It's burdensome and humiliating to be required to provide documentation when someone with a physical disability, even if not apparent to others, has no such requirement. It implies that people with psychiatric disabilities are frauds. It's infuriating and makes me not want to fly, or to just lie and say



that my service dog is for a physical disability, so that I'm not volunteering to be discriminated against.

366) A veterinarian should not and cannot be responsible for an animal's behavior.

367) Align with ADA— consistency & properly trained staff!!!

368) Stop making things more difficult and expensive for people who are disabled. Life is hard enough for us as it is. An airline that was welcoming to service dog handlers would absolutely get my business, even if I had to pay a little more.

369) Delta has taken over 4 months to alert me personally of the change in their policies, and only did so after I opened a case with them myself to ask what updated info I needed to provide. My psychiatric disability is treated very differently from other disabilities, even though I have a trained service dog that performs tasks, NOT just an ESA.

370) I think as long as dogs flying in cargo is dangerous, people will continue to abuse the ACAA laws. I don't see any problem with requiring veterinary health certificates because your animal should be up to date on veterinary care anyway. I don't think it is fair to ask a vet for a behavioral assessment though. I don't think many vets would be comfortable speaking for a dog's behavior when they are not animal behaviorists. I also believe that flight attendants should stop side eyeing all animals that are well behaved on the flight. If my dog isn't bothering anyone, drop the attitude. I'm following the law.

371) I just stopped being homeless this month. I prioritize my dog's wellbeing over my own but I can't afford vet visits for my dog OR doctors visits for myself. It's just out of my price range when I'm struggling to survive with my disability.

372) This is such crap!!! People with real disabilities are being taken advantage of by bad behaving ESA's

373) Please go over the public access standards for service dogs. Fake SD's usually won't meet these standards.

374) I disagree with legislation that groups ESAs and psychiatric service dogs together because they are very



different levels of training. Requiring proof of disability may be reasonable, but a customized letter is not. Showing an insurance form or a copy of a patient chart with diagnosis listed would be a much easier way to “prove” disability, though a diagnosis does not necessarily equal a disability and does not document the dog’s training level. Allowing flyers with service dogs to keep their documentation on file for a set period of time could also be helpful, so they are not scrambling to get documents for a last-minute flight if they are within that time frame. For proof of training, the AKC offers a variety of obedience tests that any service dog and ESA should be able to pass. It is not expensive to be evaluated for those certifications and offers standardized proof of training.

375) all of these costs and burdens are tax deductible since a real service animal is required.

376) We’ve flown with my sons service dog several times. It’s easy to spot the fakes, it’s just that nothing is done about it.

377) I believe that this will add upwards of 1 to 2 grand in training as well as more money for more doctors appointments and time spent going through extra steps to get ready for likely an already stressful trip. It will isolate the people who are already very isolated. It also means that service members spouses who have service animals will have even more paperwork and hoops to jump through just to travel with their spouse. This also could be an invasion of privacy into a disabled persons already very hard and public life.

378) I think any animal that flies crate free needs to be an actual Service Animal and NOT an ESA. Also, anyone with an actual Service Animal should be willing to pay nominal fees to get Health Certificates for their SD and have CGC certification for their SD.

379) Service dogs should be allowed to fly. Emotional support animals should not be allowed. A SD can be providing services to their handler whether physical or psychological issues. An emotional support dog simply helps the flyer. The distinction needs to be made clear.

380) I’ve flown with several airlines at this point and 2 of them not only violated my rights but tried to tell me that wasn’t



something they had to do. But based on the DOT air travel policies for service animals they did have to provide those accommodations because of my service animals size and my disability (and they were available when I called ahead early).

381) I believe that ESA's should have to have paperwork and proof of training to prevent them from acting out in cabin. I fear for my Service dog when flying, and on Friday I flew with a fake service dog that was out of control next to us, and could have easily attacked my service animal

382) It discourages me from flying because it's so much extra work and hassle.

383) Disabled people are usually on a small fixed income have saved to take a trip & getting a lot of documents will add at least another \$200.00 to their trip making in likely impossible for them.. If there were a single certification for the dog that would be good for a few years it would take a weight off us financially. Any dog acting frightened, barking, lunging at people or out of control should not be allowed to board.. They are the fake dangerous animals & we don't like being attacked by them...

384) I go to a low-cost vet, so they are only open once a month. I would be willing to get paperwork if it helps to cut down on fake service animals, however I do not think discriminating against people with different disabilities is a wise move. Whether they have autism, PTSD, or are blind, I think everyone should have to provide paperwork on their service dog, if anyone does. The reason I believe this is because I have seen many fake "service dogs" used by people with obvious disabilities. These are actually ESAs, which are usually untrained, distract real service dogs, and set a bad image for those who have put in the time and money to train a service dog. By requiring paperwork from everyone, instances of fake "service dogs" should immediately drop. Also, I would not suggest accepting paperwork from online 3rd parties who sell "certificates". Anyone can buy these online, so these type of certificates shouldn't be trusted.

385) It will be difficult to find a balance, but I fear taking my service dog on flights due to the number of fakes. One fake could ruin my SD costing thousands and years of time.



386) You guys need to get informed with the actual people who have disabilities advising you.

387) If there are more than one animal on the plane, accommodate the passengers and separate the animals

388) Just because a year passes on my doctors notes and prescription dates doesn't mean my disability magically went away. It's a pain to have to get new letters from my vet, my psychiatrist, my therapist, and my SD trainer every year with just a different date.

389) Psychiatric service animals and emotional support animals are not the same thing. I think it is unjust to group them in the same category when there are clear differences.

390) I'm completely against grouping together ESAs and PSDs. One (PSD) is a highly trained dog that mitigates a disability. The other (ESA) is nothing more than an untrained pet with no guarantee on how it behaves in public. It's discrimination to separate physical disabilities from mental / invisible disabilities.

391) I have flown with my well trained psychiatric service dog and he is very well behaved. My therapist still does not fully understand he is more than an ESA and she always writes prescription for ESA, regardless of whether he is an ESA or psychiatric service dog, he is public access trained which is what should matter. I am totally against confining ESA to crates if they are trained, and I have never encountered any issue while flying with him or any other animal. Thank you for your time,
Sincerely,
Marie

392) I fly with a legally certified and registered Canadian guide dog and don't believe Emotional support animals should be afforded the same rights. Guide dogs undergo years of training to ensure their temperament and training before being granted access to public spaces.

393) As long as the policy of requiring documentation isn't a surprise, I would be 100% for it -- as the handler of a true service dog, it frustrates me that people abuse disability accommodations to bring their pets. Getting a service dog cost



me several thousand dollars atop normal pet costs, as well as countless training hours, and I don't mind proving certification. Flying is something I have to plan well in advance anyway. That said, I absolutely do not want to block anyone with a legitimate disability from flying with a needed service dog.