



14 January 2009

Dennis Cannon
Office of Technical and Information Services
Architectural and Transportation Barriers Compliance Board
1331 F St. N.W. – Suite 1000
Washington, DC 20004-1111

Ref: **Docket No, 2007-1, RIN 3014-AA38**

Subject: Comments on the second draft of revisions to the ADA Accessibility Guidelines for
Transportation Vehicles

Dear Mr. Cannon:

In accordance with the requirements laid down in the Federal Register, New Flyer of America and New Flyer Industries Canada ULC (together, New Flyer) is supplying the following comments regarding the subject draft. Comments are in order to their appearance in the draft. New Flyer is a manufacture of heavy duty transit buses.

T203.2.2.2 Bridgeplates and Ramps. – Both advisories to this section indicate that the slope of the ramp or bridgeplate must not exceed 1:8 when deploying to station platforms. As a manufacturer New Flyer is obliged to build to the specifications stated in regulations once effective. However, as a vehicle manufacture New Flyer does not control the height of station platforms. This leaves two options, either that a tolerance be stated for station platform height, so that New Flyer can design to meet the tolerance, or that New Flyer design a ramp or bridgeplate as close as possible to the requirements, given the ambiguity in the requirements, and states that it can only meet the ADA requirement for platforms between a specific height range. The second option may create unfair competitive advantages for vehicle manufacturers who have designed for a range of platform height which is not available in a specific city or county. It is therefore requested that the definition of compliance to the 1:8 slope also include a height range for the station platform, so all manufactures can design to the same requirements.

T203.4.2.2.1 Doorways on One Side of Vehicle. – This paragraph references two sections not found in the document (T203.4.3.1.1 and T203.4.3.1.2).

T402.4 Size (Graphics). – The metric dimensions on all the graphics in this section read “min” and should read “mm”, unless indicating a “minimum” dimension, in either case it should be clarified. In the second graphic, the dimensions from section T402.4.1 are improperly represented.

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T403.3 Movement. – Please clarify if this paragraph also applies to rear facing wheelchairs or mobility aids as designing securement for all rear facing users may not be possible. Those who prefer a rear facing seat do so because securement is not required.

T403.5 Padded Head Rest. – There are no specifications for testing or structural capability for this component (e.g. ...backrest must withstand 2 G's of force on the longitudinal plane to a 600 lb load ...).

T403.5 Padded Head Rest (Graphic). – There is no minimum thickness specification for the padded head rest, just that it protrudes into the space by 9 to 12 inches. Also the graphic appears to indicate that all the G loading in a stop would be absorbed in the mid-back of the wheelchair user. The graphic does not obviously represent the required distance from the “wheel or device stop” to the front of the back rest.

T502.2 Clear Width. – The increase in dimension causes some concern, not for design, but for testing. In the past with the smaller dimensions, most would try to qualify or disqualify the space via the non-recognized “box test”. The path being compliant only if a 30 (W) x 40 (L) x 30 (H) box could maneuver from the door to the securement location. If box is now increased in size to 32 (distance between door grab handles) x 48 (implied length) x 40, it will most likely not fit. The Advisory T502.2 indicates that a 3D model be used to determine if an occupied wheelchair can maneuver from doorway to securement location, it does not mention the dimensions of the occupied 3D wheelchair (hopefully, it is not box shaped), perhaps a suggested 3D model form could be made available, or the dimensions supplied so one can be created.

706.1 General. – This specifies that visible stop request indicators should only be located at the front of the vehicle. Rear facing passengers will not see these. We would suggest a second sign towards the rear of the vehicle or a special visual indicator located at the rear facing position(s) should be incorporated.

T802.2 Slip Resistance. – a minimum and maximum tolerance for the level of slip resistance (coefficient of friction, wet/dry or static) should be stated for both normal flooring as well as non-skid flooring for designated areas like the ramp. Some non-skid flooring is too aggressive and may actually cause people to stumble. Some non-skid flooring is ineffective or becomes ineffective after extended use. Previous recommendations from the US Access Board have indicated that a minimum 0.8 coefficient of friction for ramps and other designated areas. For general flooring, OSHA recommends a minimum static coefficient of friction to be 0.5. Typical bus flooring material has a static coefficient of friction of 0.6.

I thank you for the opportunity to supply comments for consideration. If you have questions or require clarification on the items above please contact me.

Sincerely,

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