

# PORTER AIRLINES ACCESSIBILITY PLAN - 2024 PROGRESS REPORT

## PORTER AIRLINES INC. and PORTER AIRLINES (CANADA) LIMITED

June 1, 2024

### Introduction

This Progress Report on the Porter Airlines Accessibility Plan is a joint report of Porter Airlines Inc. (“PAI”) and Porter Airlines (Canada) Limited (“PACL”) (collectively, “Porter” or “Porter Airlines”).

On June 1, 2023, when PAI and PACL published their Accessibility Plan, neither qualified as a “large air carrier”, but both entities nonetheless undertook to voluntarily comply with the requirements of the *Accessible Transportation for Persons with Disabilities Regulations* (“ATDPR” or the “Act”) applicable to large air carriers. As of January 1, 2024, PAI became a “large air carrier” formally subject to the ATDPR, and PACL continues to voluntarily comply with the requirements of the ATDPR. To the extent that PACL will not become a “large air carrier” prior to January 1, 2025, it has nonetheless undertaken to voluntarily comply with the requirements of the ATDPR applicable to large air carriers.

Porter remains confident that its accessibility policies and procedures meet and exceed the regulatory requirements applicable to PAI and PACL, and this Progress Report provides updates on action items identified in its 2023 Accessibility Plan, and otherwise reports on Porter’s ongoing efforts to incorporate passenger feedback to improve its service delivery to persons with disabilities.

## I. General

### A. Designated Persons

#### 1. Preparation of Accessibility Plan and Progress Reports

This Progress Report was prepared by Greg Sheahan, Porter’s General Counsel and Corporate Secretary, in consultation with team members overseeing various departments responsible for delivery of accessible services.

#### 2. Receipt of and Response to Feedback

The designated person for receipt of and response to feedback under the feedback process designed below is Porter’s Specialist, Customer Relations and Regulatory Affairs.

### B. Feedback Process

Members of the public may provide feedback to Porter on this Progress Report or on barriers encountered by passengers travelling with Porter via the following means:

- Telephone: 1-855-542-3707
- Voice relay service: TTY – dial 711
- Email: [disabilityassistance@flyporter.com](mailto:disabilityassistance@flyporter.com)
- Web form: <https://www.flyporter.com/en-ca/customer-service/help-contact/accessibility-feedback>
- via Facebook Messenger: <https://www.facebook.com/porterairlines>
- via Twitter direct message: @porterairlines
- via Instagram message: @porterairlines
- In person or by mail at:
  - Porter Airlines
  - 250 Yonge Street, Suite 2800
  - Toronto, Ontario M5B 2L7
  - Attention: Accessibility Plan Feedback

Feedback may be provided anonymously: (a) by mail; (b) by telephone, by disabling the caller ID function, or (c) by email or social media via an anonymous account that does not identify you.

### **C. Progress on 2023 Action Items, Identification and Removal of Barriers**

As set forth in greater detail below, Porter has completed the action items identified in its 2023 Accessibility Plan, and has been successful in taking additional steps toward the identification and removal of barriers in delivering its services, including:

- (a) implementing accessibility features in its common use airport kiosk application;
- (b) upgrading accessibility functions in its mobile application and planning the launch of a new mobile application, to be launched in July 2024, designed for and tested to ensure accessibility;
- (c) launching a Digital Accessibility Newsletter for its internal IT team members;
- (d) re-engaging Fable Tech Labs Inc. to provide ongoing support and accessibility testing of digital platforms and products, including by persons with a variety of disabilities;
- (e) consulting with Inclusion Canada to make revisions to its online content to ensure it meets current standards of inclusion and accessibility, particularly the sections pertaining to Disability Assistance; and
- (f) collecting feedback from passengers who travel with battery-powered wheelchairs to enable improvements to its customer service and operations functions relating to the carriage of such wheelchairs on board its aircraft.

#### **D. Alternate Formats**

Porter will make this Progress Report available in alternate formats including (a) print, (b) large print, (c) braille, or (d) audio format upon request when the request is made via any of the above-listed channels for providing feedback.

## **II. Information and Communication Technologies (ICT)**

With respect to the Action Items identified in the 2023 Accessibility Plan:

- Porter successfully launched its common use airport kiosk application with accessibility features as required by the ATDPR. As well, Porter continues to work cooperatively with airport authorities to troubleshoot accessibility features arising from hardware issues in the airport-furnished kiosks, and otherwise conducts ongoing testing of any new releases or updates to its application on an as-needed basis.
- Shortly following the publication of this Progress Report (July 2024), Porter will be launching its new and improved mobile application, designed to include required accessibility features, tested with the support of Fable Tech Labs Inc.
- Porter made revisions to certain of its web content, particularly in its Disability Assistance section, based on collaboration with Inclusion Canada, to ensure its language and content reflects current standards of inclusion and accessibility.

In addition, Porter completed the following additional actions relating to the identification and removal of barriers to accessibility:

- In October 2023, Porter launched a Digital Accessibility Monthly Newsletter, intended as a resource for its IT team members and providing information on ongoing accessibility initiatives at Porter, available accessibility training resources and learning opportunities, and news stories on accessibility developments in the airline industry.
- In response to feedback from passengers regarding obstacles encountered when attempting to travel on Porter with battery-powered wheelchairs, Porter has undertaken revisions to its related online content to improve clarity to passengers seeking to travel with such mobility devices, and is concurrently improving scripting and information collection by its Disability Desk customer relations processes (as also described below in “Communications, other than ICT”).

## **III. Communication, other than ICT**

With respect to the Action Items identified in the 2023 Accessibility Plan, Porter has received feedback from passengers, including directly from those passengers and via voluntary mediated discussions with the Canadian Transportation Agency, concerning obstacles or potential obstacles during their travel, resulting in the following steps:

- In addition to undertaking clarifications to its web content concerning the carriage of battery-powered mobility devices, Porter has undertaken revisions to its processes for information collection by its Disability Desk customer relations processes to ensure passengers travelling with such devices are aware of the requirements, including without limitation the need for the passenger to furnish information on battery disconnection or removal where applicable (as also described below in “ICT”)
- In response to feedback from passengers regarding obstacles encountered when attempting to travel on Porter with battery-powered wheelchairs, Porter has undertaken revisions to its related online content to improve clarity to passengers seeking to travel with such mobility devices, and is concurrently improving scripting and information collection by its Disability Desk customer relations processes (as also described above in “Information and Communications Technology (ICT)”.
- In one instance, through discussions facilitated by the Canadian Transportation Agency, Porter assisted a passenger with extreme pet allergies to ensure they could contact Porter on short notice to ensure they would not need to travel on a flight that had any in-cabin pets and ensuring she could change her booking if needed, on short notice and at no cost to the passenger.

#### **IV. Procurement of Goods, Services and Facilities**

Porter has received no feedback from passengers or otherwise identified any obstacles pertaining to its procurement procedures since the publication of its 2023 Accessibility Plan.

#### **V. Design and Delivery of Goods and Services**

As discussed in Sections II and III above, Porter has undertaken improvements to its information and communication procedures and content relating to the carriage of battery-powered mobility devices, but has not received feedback on nor otherwise identified any material obstacles relating to Design and Delivery of Goods and Services since the publication of the 2023 Accessibility Plan.

#### **VI. Transportation**

Porter has not received feedback on nor otherwise identified any material obstacles relating to Transportation (as contemplated by the ATPRR) since the publication of the 2023 Accessibility Plan.

#### **VII. Built Environment**

Porter has not received feedback on nor otherwise identified any material obstacles relating to Built Environments (i.e. its aircraft) since the publication of the 2023 Accessibility Plan.

## VIII. Provisions of CTA Accessibility-Related Regulations

Porter continues to comply with the portions of the ATDPR applicable to “large air carriers” (notwithstanding that, in the case of PACL, it is not a “large air carrier” as defined in the ATDPR) since the publication of its 2023 Accessibility Plan.

## IX. Feedback Information

In its 2023 Accessibility Plan, Porter sets out various communication channels through which feedback on its Accessibility Plan may be provided. These are also restated in the General section above, as well as in Porter’s Accessibility Plan.

Since its publication of its 2023 Accessibility Plan, Porter has received feedback through email, through direct discussions with passengers (in person and telephone), and discussions facilitated through the Canadian Transportation Agency.

As described in the pertinent sections of this Progress Report, Porter received feedback on matters including:

- Delivery of services relating to carriage of battery-powered wheelchairs, including communications and at-airport service delivery
- Timeliness of assistance provided (generally wheelchair services or embarkation/disembarkation of aircraft)
- Facilitation of service delivery to passengers with acute pet allergies

## X. Consultations

Since the publication of its 2023 Accessibility Plan, Porter has continued to consult with disability organizations, and incorporated their feedback into its procedures and action plans under the Plan, more particularly:

- Porter has renewed its engagement of Fable Tech Labs to provide feedback on the design of accessibility features – including the overall accessibility of content and functions – of its website [www.flyporter.com](http://www.flyporter.com), its self-service kiosk and mobile applications. As well, Fable provided testing by persons with various kinds of disabilities on its website and mobile application.
- Porter consulted with Inclusion Canada, including by updating certain written website content to reflect current standards of inclusivity and accessibility, based on input and feedback from Inclusion Canada.
- Porter has received feedback from numerous passengers with disabilities via voluntary mediated discussions with such passengers facilitated by the Canadian Transportation Agency.
- Porter has hired as Supervisor of its Call Centre a person with a mobility disability, which Supervisor also heads up Porter’s Disability Desk and who provides valuable feedback on an

disabilities.

# PORTER AIRLINES ACCESSIBILITY PLAN

## PORTER AIRLINES INC. and PORTER AIRLINES (CANADA) LIMITED

June 1, 2023

### Introduction

This Accessibility Plan is a joint plan reflecting the policies, procedures and plans of both Porter Airlines Inc. (“PAI”) and Porter Airlines (Canada) Limited (“PACL”) (collectively, “Porter” or “Porter Airlines”) aimed at ensuring persons with disabilities can continue to enjoy Porter’s premium travel services without facing any undue obstacles.

Since PAI first launched its scheduled air services from Billy Bishop Toronto City Airport (YTZ) in October of 2006, we have been proud to deliver a premium service that puts passengers first and redefines what air travelers can expect from airlines, whether their travel is for leisure, business, health or medical purposes, or other reasons. From the outset, Porter has sought to expand and improve its services available to persons with disabilities, with a view to ensuring that its passengers with disabilities can enjoy the full range of its services and destinations without facing any undue obstacles. To that end, Porter has sought not only to meet, but to exceed the regulatory requirements for accessible services that apply to its services.

When PAI’s sister company PACL launched its jet services in February 2023, expanding the reach of Porter’s premium air services to trans-continental destinations, PACL’s services were conceived from the start to meet the same high standards of quality and accessibility.

As neither of PAI or PACL is a “large air carrier” as defined in the *Accessible Transportation for Persons with Disabilities Regulations* (“ATDPR” or the “Act”), they are both subject to the requirements set forth in Part VII of the *Air Transportation Regulations* (“ATR”). However, both PAI and PACL have elected voluntarily to implement virtually all requirements applicable under the ATDPR, and is in the course of implementing certain final outstanding ATDPR provisions applicable to self-service kiosk software and mobile apps (as described further below). In light of this voluntary adoption of the robust accessibility regime set out in the ATDPR, which generally go over and above the requirements set out under Part VII of the ATR, Porter is confident that its accessibility policies and procedures meet and exceed the regulatory requirements applicable to PAI and PACL, and has developed its Accessibility Plan with the primary aim of establishing regular, formal procedures for receipt and review of feedback to identify potential remaining obstacles in its provision of services, and for monitoring passenger complaints and internal feedback to ensure its existing processes and procedures continue to function as designed, incorporate passenger’s feedback, and otherwise meet or exceed all legal requirements.

## I. General

### A. Designated Persons

#### 1. Preparation of Accessibility Plan and Progress Reports

This Accessibility Plan was prepared by Greg Sheahan, Porter's General Counsel and Corporate Secretary, in consultation with team members overseeing various departments responsible for delivery of accessible services including Customer Experience Digital Solutions, Learning & Development (Customer Service & Airports), Flight Operations, Commercial Services (Procurement), Safety, Customer Relations & Call Centre, and In-Flight Operations.

Mr. Sheahan is also the designated person who will prepare the forthcoming Progress Reports.

#### 2. Receipt of and Response to Feedback

The designated person for receipt of and response to feedback under the feedback process designed below is Porter's Specialist, Customer Relations and Regulatory Affairs.

### B. Feedback Process

Members of the public may provide feedback to Porter on this Accessibility Plan or on barriers encountered by passengers travelling with Porter via the following means:

- Telephone: 1-855-542-3707
- Voice relay service: TTY – dial 711
- Email: [disabilityassistance@flyporter.com](mailto:disabilityassistance@flyporter.com)
- via Facebook Messenger: <https://www.facebook.com/porterairlines>
- via Twitter direct message: @porterairlines
- via Instagram message: @porterairlines
- In person or by mail at:

Porter Airlines  
250 Yonge Street, Suite 2800  
Toronto, Ontario M5B 2L7  
Attention: Accessibility Plan Feedback

Feedback may be provided anonymously: (a) by mail; (b) by telephone, by disabling the caller ID function, or (c) by email or social media via an anonymous account that does not identify you.

Except where feedback is provided anonymously, Porter will confirm receipt of feedback in the same manner in which it was provided to Porter.



### **C. Action Plan – Identification and Removal of Barriers**

As indicated above and as described in greater detail below, both PAI and PACL have undertaken to implement policies, processes and procedures aimed at voluntarily complying with all requirements applicable to “large air carriers” under the ATDPR, despite the fact that those requirements do not apply to them as neither PAI nor PACL meets is currently a “large air carrier” as defined in the Act. These voluntary undertakings reflect both the expectation that PAI and PACL will become “large air carriers” in the years to come, as well as Porter’s recognition that the ATDPR provides a robust framework for addressing and eliminating obstacles to accessibility of air travel for the benefit of its passengers with disabilities.

Accordingly, in addition to certain in-progress projects discussed in Section II below, Porter’s Accessibility Plan is primarily aimed at establishing regular, formal procedures to monitor the effectiveness of its accessibility programs and to identify and prevent any barriers identified through ongoing regular review of passenger feedback, as follows:

- No less than twice annually, Porter’s General Counsel will convene a meeting of a committee comprised of leaders from the various departments responsible for implementation and delivery of Porter’s accessibility programs and services to review accessibility-related passenger feedback (including complaints), the first such review to occur within six months of the date of publication of this Accessibility Plan; and
- On an ad hoc basis, Porter’s Specialist, Customer Relations and Regulatory Affairs (the person responsible for receiving feedback under this Plan) will escalate instances of accessibility-related passenger feedback which may demonstrate gaps or errors in the implementation of Porter’s accessibility programs and services, or which otherwise merit escalation, in order to consider corrective action.

### **D. Alternate Formats**

Porter will make this Accessibility Plan available in alternate formats including (a) print, (b) large print, (c) braille, or (d) audio format upon request when the request is made via any of the above-listed channels for providing feedback.

## **II. Information and Communication Technologies (ICT)**

With the two exceptions noted below, Porter’s information and communication technologies systems meet all of the requirements set forth in the section of the ATDPR pertaining to “Communication of Information to Persons with Disabilities” which apply to “large air carriers” (sections 4-14), including that:

- Porter’s website, [www.flyporter.com](http://www.flyporter.com), meets the requirements for a Level AA conformance that are set out in the Web Content Accessibility Guidelines. In the course of developing and updating its website to meet these standards, Porter engaged the services of Fable Tech Labs Inc., which provides consulting on technology platforms, including testing and feedback by persons with various kinds of disabilities.
- Porter has a section of its website dedicated to Disability Assistance, which provides details on its available Disability Assistance Services and how they may be accessed or requested, including how special assistance requests may be made in the course of booking travel via the website.
- At the foot of each page of the Disability Assistance Services section of its website, Porter displays alternative methods of contacting Porter to complete bookings, request special assistance, or obtain information about our Disability Assistance Services via telephone to our Disability Assistance Desk, including information on use of a voice relay service to assist with telephone service as may be needed.
- As concerns public announcements, general terminal audio announcements are reflected in visual format in the flight information displays throughout the air terminals.

## Action Items

1. Concurrent with the release of this Accessibility Plan or soon thereafter, Porter will have released its application for use by passengers at common use self-service kiosks at certain airports, as well as a mobile application which will perform many of the functions available on its website. While not required under Section VII of the ATR, Porter has elected to develop functions and features to ensure that both of these applications meet the requirements for accessibility for such applications as set out in the ATDPR, with the aim of completing the implementation by September 2023. As it did in developing WCAG accessibility compliance for its website, Porter has engaged Fable Tech Labs Inc. to conduct testing and provide feedback by persons with various kinds of disabilities.
2. Porter will otherwise conduct regular scheduled and ad hoc reviews of feedback received from its passengers as described in Section I.C. above to identify and address any obstacles in its systems and services relating to ICT.
3. Coordinate with Inclusion Canada to receive feedback on updating language on the Porter website to ensure it reflects current standards of inclusion and accessibility, with an aim to completing and publishing content updates by July 2023.

## III. Communication, other than ICT

Porter has elected to voluntarily comply with all requirements relating to communication with passengers which are applicable to large air carriers under the ATDPR.

More particularly, Porter trains all of its team members who interact with passengers in the course of carrying out their functions – including Airport Staff/Customer Service Representatives, Flight Crew, and Customer Care/Call Centre personnel – to do so in an informed and respectful manner that takes account of the nature of the person’s disability and any assistive devices or methods of communication that may facilitate communication with the passenger, consistent with Section 6 of the ATDPR. The training of these team members incorporates the Canadian Transportation Agency’s “Accessibility for All” videos and related materials, including those pertaining to ‘Communication Best Practices’.

In addition, Porter voluntarily makes available all of the services required for large air carriers under the ATDPR which pertain to providing specialized communications to passengers with disabilities, including:

- For all passengers who identify their disability when making a reservation, engaging in a discussion with the passenger as needed to identify their needs in relation to the disability and the services offered by Porter in relation to those needs. (For online bookings, phone numbers - including TTY - and email address is provided during booking flow to facilitate this discussion);
- Providing individualized safety briefing and demonstration on board;
- For passengers with visual impairments, providing a description of the aircraft layout; providing a tactile familiarization with the equipment they may need to use, with their immediate environment, and with the nearest emergency exit; making available Braille and large-print safety instruction cards; providing the layout of the aircraft, including the location of washroom and exits and any operating controls at the passenger seat; and describing the food and beverages that are offered on board.

Finally, all aircraft operated by Porter meet all of the technical requirements in part 3 of ATDPR, including those relating to communicating information to people with disabilities, e.g. for signage, tactile row markers, tactilely discernible and colour-contrasted call buttons.

### **Action Items**

Porter will conduct regular scheduled and ad hoc reviews of feedback received from its passengers as described in Section I.C. above to identify and address any obstacles in its systems and services relating to Communication other than ICT.

## **IV. Procurement of Goods, Services and Facilities**

Porter’s procurement procedures are aligned with its choice to comply with the requirements of the ATDPR which apply to “large air carriers”. Accordingly, where products are procured or services contracted that are for passenger consumption or use, such products and services are ensured to be accessible to passengers with disabilities. More particularly:

- With respect to the procurement of aircraft, Porter requires that all aircraft have features that ensure the aircraft meet the applicable “Technical Requirements” set out in the ATDPR (e.g. with respect to the design of call buttons, legibility of signage, on-board wheelchair capability, etc.).
- With respect to the procurement of equipment aimed at assisting with boarding and disembarkation such as lifts, ramps and stairs, Porter exclusively procures equipment that meets the applicable “Technical Requirements” of such equipment set out in the ATDPR.
- With respect to on-board equipment such as wheelchairs and seats, Porter likewise exclusively procures equipment that meets the applicable “Technical Requirements” of such equipment set out in the ATDPR.
- With respect to in-flight food and beverage products, Porter offers assistance in describing available food products, opening packages, and identifying food items, consistent with Sections 35(p) and (q) of the ATDPR.
- With respect to subcontracted airport “above wing” customer services (check-in, lounge and gate attendants), Porter requires that (a) all such providers have or have access to equipment (e.g. wheelchairs) meeting ATDPR requirements, and (b) such providers’ workers undergo the same training as Porter’s own employees who provide such services, which incorporate the Canadian Transportation Agency’s “Accessibility for All” training videos and related materials, as well as specific training on the various services required by “large air carriers” to be provided under the ATDPR (discussed in greater detail in Section V “Design and Delivery of Goods and Services” below).
- With respect to subcontracted airport ramp “below wing” ground handling services, Porter requires that all such providers have or have access to equipment (e.g. ramps, lifts, stairclimbers) meeting ATDPR requirements, and (b) such providers’ workers undergo the same training as Porter’s own employees who provide such services (e.g. with respect to handling/disassembly/assembly/carriage of mobility aids, deployment of equipment to assist with boarding or disembarkation of persons with mobility limitations, etc.).

## Action Items

Porter will conduct regular scheduled and ad hoc reviews of feedback received from its passengers as described in Section I.C. above to identify and address any obstacles in its systems and services relating to Procurement of Goods, Services and Facilities.

## V. Design and Delivery of Goods and Services

As previously indicated, while PAI and PACL are not considered “large air carriers” under the ATDPR – and are therefore subject to the less robust accessibility requirements applicable to other carriers under Section VII of the ATR – they have elected to design and implement their policies and procedures to comply with the more extensive and prescriptive requirements for

large air carriers under the ATDPR. Porter ensures that any requested accessibility services are recorded in the relevant passenger's record of travel and has developed procedures to ensure that communication of those needs are relayed to all team members and departments with responsibility for delivering the accessibility services throughout the course of the passenger's travel.

As described in Section III above, Porter trains all of its team members who interact with passengers in the course of carrying out their functions to do so in an informed and respectful manner that takes account of the nature of the person's disability and any assistive devices or methods of communication that may facilitate communication with the passenger, consistent with Section 6 of the ATDPR. The training of these team members incorporates the Canadian Transportation Agency's "Accessibility for All" videos and related materials, including those pertaining to 'Communication Best Practices'. As well, all members of Porter's relevant teams responsible for providing particular accessibility services receive specific training in the delivery of such services (which services are set out in detail in Section VIII below).

In addition, other team members who may not interact with passengers in the normal course of their duties are trained in the performance of the tasks and functions required under the ATDPR – e.g. pilots are trained to relay accessibility-related needs to ground handling crews to ensure that appropriate equipment is deployed for passengers who need assistance boarding or disembarking, and ground handling crews are trained to deploy such equipment.

The Porter team members responsible for performing such services and functions receive the same training whether employed by Porter or through a subcontractor.

## Action Items

1. Porter will conduct regular scheduled and ad hoc reviews of feedback received from its passengers as described in Section I.C. above to identify and address any obstacles in its systems and services relating to Design and Delivery of Goods and Services.

## VI. Transportation

While air carriers are not generally responsible for transporting passengers to and from airports, the ATDPR sets out certain responsibilities for large air carriers in aid of transporting passengers through and between various areas within airports, all of which Porter has adopted and implemented as if it was a large air carrier under the ATDPR. These services include:

- service wheelchairs at all airports Porter serves, and assistance transferring between a passenger's own mobility aid and a Porter-furnished mobility aid;
- assistance proceeding:
  - to the boarding area after check-in
  - through security screening

- through border clearance
- to general public area after disembarkation
- to a location where the passenger may receive assistance to the curbside zone from terminal personnel
- to a location where the passenger may receive assistance from another airline within the same terminal where the passenger is connecting to such airline
- assistance with boarding and disembarking, including via provision of assistive equipment such as ramps and stairclimbers

### **Action Items**

Porter will conduct regular scheduled and ad hoc reviews of feedback received from its passengers as described in Section I.C. above to identify and address any obstacles in its systems and services relating to Transportation.

## **VII. Built Environment**

The ‘built environments’ controlled by Porter consist of its aircraft, consisting of a fleet of DHC-8-400 turboprop aircraft operated by PAI, and E195-E2 jet aircraft operated by PACL. Porter has elected to ensure all of its aircraft meet the “Technical Requirements” set forth in the ATDPR, including in particular the accessibility requirements for stairs used for boarding and disembarkation, on-board wheelchairs, passenger seats, tactile row markers, safety feature cards, accessible washrooms, signage, and floors (save and except that certain of PAI’s DHC-8-400, which are “pre-existing aircraft” under the ATDPR, were not manufactured with tactile row markers, and Porter mitigates this via assistance from flight crew as needed).

Moreover, Porter has elected further to ensure that all of its aircraft comply with certain additional voluntary standards set forth in the Canadian Transportation Agency’s “Aircraft Accessibility for Persons with Disabilities: Code of Practice for Fixed-Wing Aircraft with 30 or More Passenger Seats”.

### **Action Items**

Porter will conduct regular scheduled and ad hoc reviews of feedback received from its passengers as described in Section I.C. above to identify and address any obstacles in its systems and services relating to Built Environment.

## **VIII. Provisions of CTA Accessibility-Related Regulations**

As neither PAI nor PACL meets the definition of “large air carrier” under the ATDPR as at the date of publication of this Accessibility Plan, both are subject to and fully compliant with the accessibility provisions set out in Section VII of the ATR. All of the provisions of Section VII (ss. 145-146).

However, in recognition of the importance of providing accessible air travel to persons with disabilities, and in anticipation of PAI and PACL becoming ‘large air carriers’ in the years to come, both PAI and PACL have elected to voluntarily adopt and comply with the more extensive and prescriptive requirements of the ATDPR applicable to “large air carriers”. As described above, Porter is fully compliant with all such ATDPR requirements, save and except with respect to the accessibility of its new self-service kiosk and mobile applications, the accessibility features of which it is currently developing and testing with a view to completing in fall of 2023.

As described above, Porter voluntarily complies with the portions of the ATDPR:

- ss. 4-10 pertaining to “Communication of Information to Persons with Disabilities”, and is in the course of implementing and testing accessibility features for its new self-service kiosk application (ss. 11-14);
- ss. 15-23 pertaining to “Personnel Training for the Assistance of Persons with Disabilities”;
- Part 2 – Service Requirements Applicable to Carriers, including ss. 31-35, 37-41, 43-44, 48-62, with the services offered listed below; and
- Part 3 – Technical Requirements, except with respect to certain of PAI’s “pre-existing aircraft” manufactured without tactile row markers.

Porter offers the following services to people with disabilities, generally on request:

Service	ATDPR Section
Opportunity to board in advance of other passengers	34(1)
Assistance with boarding, locating seat	34(1)(a)
Assistance transferring between mobility aid and seat	34(1)(a)
Assistance storing/retrieving carry-on baggage	34(1)(a)
For passengers with visual impairments, provide description of aircraft layout	34(1)(b)
For passengers with visual impairments, provide an opportunity to conduct a tactile familiarization with the equipment they may need to use, with their immediate environment, and with the nearest emergency exit	
For passengers with visual impairments, Braille and large-print safety instruction cards are available	76
Sanitization of passenger seat for persons with severe allergies	34(1)(c)
Assistance with checking in at the check-in counter	35(a)

Service	ATDPR Section
Permitting passengers with disabilities unable to use kiosks or other automated check-in processes to advance to the front of the line at the check-in counters	35(b)
<p>Assistance in proceeding through security screening, including by providing Porter team members to assist or collaborating with security authority/personnel to permit a person not travelling with the person with a disability to have access to the security screening checkpoint to assist them through</p> <p>Service wheelchairs are available and offered at all airports</p>	35(c)
Provide a 'gate pass' to a family member or friend of the passenger with a disability needing assistance (e.g. push the wheelchair, provide extensive personal assistance not provided by airline staff, such as help within a washroom or a sign language interpreter) to accompany the passenger to the gate for departure or meet the passenger at the gate upon arrival	N/A
Assistance proceeding to boarding area after check-in	35(d)
Before boarding, transferring the person between their own mobility aid and a Porter mobility aid	35(e)
Assistance with boarding and disembarking	35(f)
Assistance with storing and retrieval of carry-on baggage	35(g)
Before departure and after arrival, transferring the person between a mobility aid and their passenger seat	35(h)
Assistance moving in and out of a mobility aid space	35(i)
For passengers with visual impairments, describe the layout of the aircraft including the location of washroom and exits and any operating controls at the passenger seat (prior to departure if time permits)	35(j)
Provide an individualized safety briefing and demonstration, before departure	35(l)
Provide an accessible lavatory on board all Porter aircraft	N/A
Provide an on-board wheelchair	35(m)
Assistance moving between seat and washroom, including via transfer to on-board wheelchair if needed	35(n)
For passengers with visual impairments, describe the food and beverages that are offered for consumption	35(p)



Service	ATDPR Section
Assistance with opening food packages and identifying food items	35(q)
Assistance with proceeding through border clearance	35(s)
Assistance with retrieval of checked baggage	35(t)
Assistance with proceeding to general public area after disembarkation	35(u)
Assistance with proceeding to a location where the passenger may receive assistance proceeding to the curbside zone from terminal personnel	35(v)
Assistance with proceeding to a location where the passenger may receive assistance from receiving carrier if transferring to another segment of their trip within the same terminal	35(w)
For persons who are not independently mobile, provide a place to wait that is close to Porter team members who are available to provide assistance to the person	37(a)
For persons who are not independently mobile, periodically inquire about and attend to their needs	37(b)
Acceptance of mobility aid (within size and weight capacity of aircraft) as priority baggage, and permits the passenger to retain it until it is necessary to store it	40, 44
<p>For passengers who use mobility aids:</p> <ul style="list-style-type: none"> <li>• remove cargo and baggage from storage to make room for storage of the mobility aid</li> <li>• disassemble and package the mobility aid for carriage if necessary, and unpackage and reassemble it following arrival</li> <li>• promptly return the mobility aid to the passenger following arrival</li> </ul>	41
If a mobility aid is refused for transport, Porter will inform the passenger of the reasons for refusal at the time and provide the explanation in writing within 10 days, and will advise the passenger of any alternative trips to their destination which may accommodate the mobility aid, and if available will offer travel on that trip at the lesser of the two fares	48
Permits persons with disabilities to bring on board and retain any small assistive device needed during their travel	49
Permit a support person to travel with a person with a disability in an adjacent seat free of charge if the person, because of the nature of their disability, requires assistance (a) eating, taking medication, using the washroom, (b) transferring to and from their seat, (c) with orientation or communication, or (d) in the event of an emergency	50
Acceptance of service dog for transport and permit it to accompany the passenger on board (including by providing a vacant adjacent seat if required due to the dog's size)	51

Service	ATDPR Section
Acceptance of an emotional support dog for transport permit it to accompany the passenger on board	N/A
Provide a vacant adjacent passenger seat if required due to the nature of the passenger's disability	52
For passengers who have disabilities due to a severe food allergy, ensure a buffer zone in which passengers are not permitted to consume the said food and informing the passengers in the buffer zone that they may not do so, and removing any such food offerings from that flight's catering service	53
For passengers who have a disability due to a severe pet/animal allergy, seat any passengers travelling with pets at the rear of the aircraft and requiring such passengers to board before and disembark after the passenger with the allergy to ensure the latter will not have to pass in proximity to the animal(s).	53
For all passengers who identify their disability when making a reservation, Porter shall engage in a discussion with the passenger as needed to identify their needs in relation to the disability and the services offered by Porter in relation to those needs. (For online bookings, phone numbers - including TTY - and an email address is provided during booking flow to facilitate this discussion)	54
Assign passengers with disabilities to a seat that best meets the accessibility needs of that person, taking into account the passenger's opinion of which seats would best meet their accessibility needs (Note: All Porter aircraft have a single cabin, so the requirement to seat the passenger in the best suited cabin does not apply.)	55
Publish on Porter website information regarding maximum weight and dimensions of mobility aids we are able to carry	56
Ensure that public announcements made on board are available in audio and visual format, including Braille	57
Note in the record of travel of a person with a disability the services the carrier will provide to the person and provide written confirmation to the passenger	58
Retention of information provided by or on behalf of a passenger with a disability in connection with a special service request relating to their disability for at least three years for use of such information in connection with any future requests for similar services	59
Acceptance of all persons with disabilities for travel unless transporting the person would impose an undue hardship	60(1)
Upon refusing to transport any person with a disability due to undue hardship, provide the passenger with an explanation of the reasons for the refusal and within 10 days confirm the	60(2)

Service	ATDPR Section
same in writing including (a) the evidence of undue hardship, (b) any relevant rules, policies, procedures or regulations, and (c) the duration of such refusal and any conditions under which Porter would accept the person for transport	
For mobility aids not retained by the passenger during transport, if the mobility aid is damaged, destroyed or lost during transport or is otherwise not made available to the passenger following arrival at their destination, Porter will (a) provide the passenger with a temporary replacement mobility aid that meets their needs until the return or replacement or reimbursement for a replacement of the mobility aid, (b) reimburse the passenger for expenses resulting from Porter's failure to provide their mobility aid following arrival, (c) arrange for the repair of the passenger's mobility aid if damaged, or if not reparable or if destroyed or lost and not returned to the passenger within 96 hours of arrival, either replace it with the same model or if unavailable one with equivalent features and qualities that meets the passenger's needs in relation to their disability or reimburse the passenger for the full replacement cost thereof	61
Permit a passenger who uses a mobility aid travelling on a transborder flight to make a special declaration of interest that sets out the monetary value of the mobility aid and a description of its features, and publish a notice on the Porter website advising of the availability of same	62
Provide a toll-free disability assistance phone number, with TTY if needed, and a dedicated email address for disability-related needs, questions, etc.	N/A

## IX. Consultations

In preparing and implementing its accessibility program and in developing this Accessibility Plan, Porter consulted with disability organizations, and incorporated their feedback into its procedures and action plans under this Plan, more particularly:

- Porter retained Fable Tech Labs to provide feedback on the design of accessibility features – including the overall accessibility of content and functions – of its website [www.flyporter.com](http://www.flyporter.com), its self-service kiosk and mobile applications. As well, Fable provided testing by persons with various kinds of disabilities on its website and mobile application.
- Porter consulted with Inclusion Canada, including by sharing a near-final draft of this Accessibility Plan for feedback and suggestions. In addition to providing overall positive feedback on the draft Plan, Inclusion Canada has identified certain written website content that could be updated to reflect current standards of inclusivity and accessibility, and Porter intends to coordinate a review and update of the same with the assistance of Inclusion Canada.

Porter consulted with the Rick Hansen Foundation, including by sharing a near-final draft of this Accessibility Plan for feedback and suggestions. Initial feedback from the Foundation included the

suggestion that Porter consider obtaining an RHFAC (Rick Hansen Foundation Accessibility Certification rating) to assess the accessibility of its premises and built environments. Porter intends to review this proposal at its forthcoming Accessibility Plan Committee meeting next following the publication of this report, as well as any additional feedback that may follow from the Foundation following its completion of its review of the draft of this Plan.

ongoing basis concerning Porter's delivery of information and services to its passengers with disabilities.