

April 26, 2024

Ms. Blane Workie  
Assistant General Counsel  
Office of Aviation Consumer Protection  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

Re: DOT-OST-2022-0144

Dear Ms. Workie,

The undersigned organizations write to respectfully request that the U.S. Department of Transportation (Department) deny any requests for an extension of the comment period for the notice of proposed rulemaking (NPRM) titled, “Ensuring Safe Accommodations for Air Travelers with Disabilities Using Wheelchairs.” The NPRM was officially published for comment on March 12, 2024, with a 60-day comment period, closing on May 13, 2024.

The lack of safe, dignified air travel transport for passengers with mobility impairments, particularly those who use wheelchairs, is a crisis. Paralyzed Veterans of America filed a request for rulemaking with the Department on issues impacting wheelchair users in February 2022. The Department subsequently held a virtual, full-day public meeting in March 2022 on this issue that included participants from the disability community and air travel industry and provided an opportunity for stakeholders to submit additional comments following the meeting. The NPRM references numerous examples of concerns raised by passengers with disabilities and representatives for disability and veterans organizations, as well as the Department’s own data on wheelchair mishandling and complaints, as justification for publishing the proposed rule.

Even after sharing their urgent concerns about their safety in air travel, passengers with disabilities who use wheelchairs have waited two years to comment on the Department’s proposal for ensuring their safe accommodation. In light of the multiple years’ effort to improve the air travel experience of passengers who are wheelchair users, and the significant concerns for their safety and dignity in air travel, we believe that the Department has provided a sufficient time period for relevant stakeholders to review and comment on the NPRM.

Thank you for considering our request. If you have any questions, please contact Heather Ansley, Chief Policy Officer, Paralyzed Veterans of America, at 202-416-7794 or by email at [HeatherA@PVA.org](mailto:HeatherA@PVA.org).

Sincerely,

Access Living  
American Association of People with Disabilities  
The Arc of the United States

Blinded Veterans Association  
Christopher & Dana Reeve Foundation  
Cure SMA  
Disability Rights Education & Defense Fund  
Epilepsy Foundation  
I AM ALS  
Muscular Dystrophy Association  
National Council on Independent Living  
National Disability Rights Network (NDRN)  
National MS Society  
Paralyzed Veterans of America  
Parent Project Muscular Dystrophy  
United Spinal Association