

Response to Delegate Themes

Two delegates to the February 5, 2024, Public Works Committee raised the following themes: compliance with Accessibility for Ontarians with Disabilities Act (AODA), Bus Operator training; bus design and equipment; bus procurement; front door entry; and accessibility features on the website.

Each of the six themes will be discussed in turn, with next steps outlined where possible.

1. Compliance with the Accessibility for Ontarians with Disabilities Act ("AODA") Legislation

The City of Hamilton's Transit Division meets the AODA Transportation Standard. The Transit Division participated in and passed a desk audit in October 2021 conducted by the Ontario Ministry for Seniors and Accessibility. The Transit Division submitted documentation highlighting the Transit Division's compliance program including the Fares, Fare Parity and Fare, Support Persons sections (S.38.(1), 46.(1,2), 66.(1,3,5,6)), Accessibility Training (S.36.(1,2,3)), Non-functioning Accessibility Equipment (S.35.(1)), Emergency Preparedness and Response Policies (S.37.(1,2)), Storage of Mobility Aids (S.48.(1,2,3,4)), Pre-boarding and On-board Announcements (S.51.(1) and 52), and General Responsibilities (S.44.(1,2)) of the Integrated Accessibility Standards Regulation (AODA O. Reg 191/11). All documents submitted supported our ongoing compliance program with the applicable requirements under the Transportation Standard.

In addition to the desk audit, each year, the Transit Division provides an update on each compliance requirement to the Diversity and Inclusion Office for the purpose of the AODA Annual Report. The annual reports are publicly available online.

2. Transit Bus Operator ("Operator") Training

The Transit Division employs 14% of the City's total workforce, excluding boards and agencies, and approximately 700 of these employees are Operators. Operators are responsible for the safe operation of the transit vehicle. Operators have significant influence over the customer experience and are entrusted to deliver service excellence each day. In general, they are expected to provide customer service and support accessibility by providing assistance when requested, including securing personal mobility devices and calling bus stop locations in the event of equipment failure.

Of note, Operators are required to ensure that personal mobility devices are properly secured when on board. It is necessary for the Operator to get out of their seat and secure the device by the frame or check that the device is otherwise properly secured. Operators must assist if required when the customer wishes to get off.

Operators undergo a 22-day training program when they are hired, and this is a combination of classroom and on-road training. As Transit is a recognized Signing

Authority by the Ministry of Transportation of Ontario ("MTO"), its curriculum is standardized, meets mandatory requirements, and is approved by the MTO.

Transit uses the Canadian Urban Transit Association's ("CUTA") Transit Ambassador training modules for new Operators which includes essentials of customer service and effective communication. In addition, accessibility training includes a combined approach of both in-class training and practical training. The Transit Ambassador Accessibility Module also includes a test to ensure knowledge transfer. Transit's accessibility training for Operators includes an overview of population statistics in Hamilton and how different disabilities impact people's lives, how to interact and support people with different disabilities and the legislative requirements under the AODA Transportation Standard. Operators also receive the City's AODA and accessibility training during both on-boarding and refresher training. Practically, Operators learn the functionality of the accessible features of the bus and proper mobility device securement protocols. They also learn pre-trip testing and bus defect reporting procedures.

Additionally, a full day refresher training course was developed in 2022 for Operators. To date, 15% of Operators have received this training. Conducting this training requires an Operator to be removed from their regular work assignment and a replacement Operator assigned. Refresher training is occasionally paused to meet operational needs and is resumed when Transit can effectively balance scheduled service and refresher training. Refresher training topics include: the City's Code of Conduct, essentials of effective customer service, delivering accessible customer service, effective communication, non-violent crisis intervention training and other corporate safety related topics.

Operators are also provided a manual of operating procedures, related to providing safe, efficient customer service, safe driving, fare collection and other expectations of the position. These are refreshed and distributed to Operators annually. As part of on-going efforts to improve the customer experience, Transit incorporates lessons learned through feedback from customer contacts and will consider the information contained in the delegations and feedback from the Accessibility Committee for Persons with Disabilities (ACPD) Transportation Working Group in future revisions. Transit also reviews similar documents from other transit systems for best practices. An updated version is expected in Q1 of 2025.

While there is significant focus on the role of the Operator, fellow transit riders play a key role in the customer experience for others onboard. Transit continues to educate all transit users on being considerate of their fellow riders, including customer etiquette suggestions, such as giving up priority seats for vulnerable riders and making way for others by keeping the aisleways clear. Transit will be leveraging the upcoming CUTA "Transit Code" campaign, which is built on three key pillars: safety, courtesy and respect.

3. Bus Design and Equipment

A) Bus Design

There are three bus manufacturers in the Canadian transit market: Nova Bus, New Flyer, and Vicinity. Currently, all Transit's articulated buses are made by New Flyer, all regular sized buses are made by Nova Bus and the smaller buses are made by Vicinity. The transit bus industry is federally regulated by Transport Canada. These regulations include vehicle design, construction, and safety equipment to ensure the safe operation of buses across the country. Transit buses must first meet federal standards, and also comply with provincial legislation pertaining to the Ontarians with Disabilities Act, 2001, and the Accessibility for Ontarians with Disabilities Act (AODA), 2005. Under the Transportation Standard of the AODA, transit buses are required to be accessible to individuals with disabilities (AODA O. Reg 191/11), meaning all buses purchased on or after January 1, 2013 must:

- Be equipped with ramp(s) or lift(s) to accommodate passengers using wheelchairs or other mobility devices.
- Be able to kneel, lowering the bus to make it easier for people with mobility challenges to board and exit.
- Have external and internal annunciators to assist passengers with visual or cognitive impairments by providing audible route and stop information.
- Accommodate standard-sized personal mobility devices 30" wide by 48" in length, ensuring safe and secure transportation for passengers using such devices.
- Have internal displays showing the next stop and external displays showing the route and destination.

The entranceway of a bus has limited space available. Transit vehicles must be outfitted with stanchions at the entrance, provide safe passage for the Operator to access their seat and the space to deploy and stow the ramp without interference. Ancillary equipment, such as the farebox, Computer Aided Dispatch/Automatic Vehicle Locator (CAD/AVL) and PRESTO fare collection system are also upfitted. All of these functions are undertaken in a limited space, and still provide for a standard sized personal mobility device to enter. Any after-market customization options create an inconsistent experience and would require engineering consultation to avoid unintended harm to other designed aspects or functionality of the bus.

B) Internal and External Annunciators

Buses must be equipped with both internal and external annunciators. Transit completed a review of all annunciators in September 2024 and found that over 90% of the fleet had annunciator equipment in good working order and any hardware deficiencies have since been addressed. Operators are responsible for checking that

the annunciator system is working prior to leaving the garage as part of their circle check process and cannot change any settings.

Occasionally, there may be annunciator system failure on the road due to software or hardware issues. If this happens, Transit relies on Operator and customer feedback so Maintenance staff can address the failure. The Operations Supervision team can attend the bus while in service and do a system reset to try to recover the operation of the annunciator or the bus can be changed off on the road. If the annunciator systems are not working on board, the Operator must call out stops.

Transit is working with Information Technology to optimize software downloads to buses, followed by a software audit after each update to ensure the system remains functioning as intended. Transit will also conduct a study of internal and external volume settings under various conditions to determine the ideal base volume setting to make it easier to hear when the bus is full during daytime/peak conditions but balanced enough for evening and early morning times when the bus is not full to ensure HSR does not create elevated noise during stops and layovers.

Operations is reviewing the current process and will evaluate if additional checks of the annunciators while the bus is in service are necessary.

C) Position of "Stop Requested" Devices

"Stop Request" displays provide a visual queue and an audible bell chime when a customer has indicated they want off at the next stop. This is done by using the pull cord, pushing the stop request button or by pressing the high-visibility yellow strip. These devices meet the AODA legislation, which requires them to be installed no higher than 1,220 millimeters and no lower than 380 millimeters above the floor. Based on the feedback received, the location of the high-visibility yellow strip in the newer fleet is being reviewed to determine if it can be moved to a suggested location and remain compliant with the AODA legislation. Customers may also advise the Operator at boarding time where they would like to get off.

D) On-Board Display Screens

Electronic on-board displays show the next stop and work with the annunciators. Over time, these displays have been improved with more pixels for an even crisper display. Transit began ordering buses with rear facing display signs at the same time as the annunciator system and these were installed on the entire active fleet. Forward facing displays, based on feedback to improve the customer experience, were installed beginning with the 2014 bus model to present.

The 2010 model buses are currently scheduled to retire by the end of the first quarter of 2025, with 2011 and 2012 models scheduled to retire over the next two years. Once the 2012 model buses are no longer used in revenue service, all Transit vehicles will be equipped with both the rear and forward-facing display signs.

E) PRESTO Fare Payment System

PRESTO equipment is used on regional GO Transit and the following cities: Hamilton, Burlington, Oakville, Mississauga, Brampton, York Region, Toronto, Durham Region and Ottawa. An estimated 30 million riders per day travel on buses and trains where PRESTO is the required method of payment. As a transit agency in the Greater Toronto and Hamilton Area, Transit is required to utilize the PRESTO fare collection system in order to receive provincial gas tax funding.

The location, positioning and accessibility of the PRESTO devices on transit buses is determined by PRESTO based on the model of the bus and the other equipment in the area such as the farebox or CAD/AVL. Installation must follow the established accessibility requirements for height and access to the devices. PRESTO devices are located in very similar locations on each model of bus at each transit agency. If a customer is uncertain where the PRESTO reader is located, they are encouraged to ask the Operator for assistance.

TTC is a very large transit system, and they carry Hamilton's annual ridership in a day. TTC streetcars and buses are equipped with PRESTO equipment at all doors; however, multidoor boarding is only permitted on streetcars or if a bus is operating as a shuttle. At present, portable PRESTO machines are not available to transit agencies, although some are in use for fare verification by Station Attendants on GO Transit.

There is no universal location for a PRESTO reader that will be ideal for all customers, based on each customer's unique needs. There are a couple of ways to make using PRESTO easier, from asking the Operator for assistance, travelling with a support person or leveraging Metrolinx's newly expanded ways to pay, such as using a smart device, like a cell phone or wallet, which may be easier for some individuals. If an individual is having trouble tapping their PRESTO card, they may request assistance from the Operator. Operators will not touch cash or bank cards or retrieve the PRESTO card from pockets, wallets or purses.

In the future, when the BLAST network is built out, dual device readers may be a future function Transit considers for boarding efficiency at major transit hub locations. The Support Services Section regularly participates in the collaborative working groups established between Metrolinx and the participating transit agencies and will continue to work with PRESTO to improve the user experience through the next device refresh and through additional innovative fare products.

Transit engaged with Metrolinx about PRESTO devices and accessibility and has provided the Chair of the ACPD with a contact person should they have interest in connecting directly with the Senior Advisor, Accessibility.

4. Bus Procurement

Transit voluntarily participates in the Metrolinx Transit Procurement Initiative. The initiative has 54 participating transit agencies with a signed governance agreement in place. Since its inception in 2006, Metrolinx has conducted 27 contracts for the purchase of 2,872 buses across the province.

Metrolinx issues Requests for Proposals to the bus manufacturer market and is responsible for ensuring they meet all federal and provincial legislation. They do so by making legislative compliance a mandatory requirement in the competitive process. As the price of buses continues to increase, bus manufacturers continue to call for standardized bus interiors to help optimize pricing. Manufacturers follow standard bus designs with specific engineering standards and other legislative requirements.

Like cars, bus models may vary slightly from year to year as manufacturers react to changing design standards, efficiencies, supply chain and changes in materials. As a buyer, Transit has limited customization options, which are generally avoided because it increases the risk of impacting other functions and features which lead to multiple variations within the fleet, thus requiring more unique parts to inventory or service and an inconsistent customer experience.

5. Front Door Entry

The front door is sized accessible for standard personal mobility devices and the buses meet the AODA requirement for sizes outlined in O. Reg. 191/11, S. 55. Front door boarding is the normative practice in the transit industry as it is where the farebox is located and the Operator can then deploy the ramp at the bus stop and provide assistance to support persons with disabilities. Hamilton is somewhat unique with a rear ramp. While Transit has migrated to front door boarding only, should a person require an accommodation to enter by the rear door, it can be accommodated on an exception basis.

Transit recognizes that mass transit may have some limitations which mean the above accommodations are not sufficient for all individuals. We continue to encourage people to make their needs known to the Transit Division by contacting the HSR Customer Service line at 905-528-4200 (option 2) to book an individual orientation session with an experienced Transit Instructor. Transit is also supported by the City's Human Resources, Diversity and Inclusion Division who can work collaboratively with Transit staff to review individual rider's accommodation needs.

6. Accessibility Features on the Website

Transit provides accessibility information on its website at the Accessible Transportation Services webpage in addition to the Riding with HSR webpage. The Accessible Transportation Services webpage provides information on bus features such as accessible low floor buses with ramps and standard sizing and priority seating. It also

explains the process to apply for specialized transportation (Accessible Transportation Services) if an individual is unable to use conventional transit services. Riding with HSR provides more general information on items like accessible bus stops, service animals, and how to ride the bus respectfully.

Delegates raised other features that were either not mentioned or not explained well. Transit agrees the information could be presented in a more user-friendly format and therefore, the Customer Experience and Innovation section is in the process of reviewing and updating all content for Transit, including the accessibility information. Additionally, Customer Experience and Innovation can seek feedback on content from the conventional and specialized customer panel, and the ACPD Transportation Working Group.

Conclusion

While Transit meets the requirements set out in legislation under the AODA, we understand that persons with disabilities wish to use the transit service as independently as possible, and that being able to use both specialized service and conventional service increases travel choice. Transit remains committed to continuing to improve service options through customer feedback and we continue to encourage customers to contact HSR's Customer Service regarding accessibility concerns so that they can be addressed. Transit will continue to be as responsive as possible and take action through customer feedback, incident review, follow up with staff and/or maintenance, and continuous improvement efforts.