



ONCE'S PROPOSALS ON THE CONSULTATION DOCUMENT BY THE SERVICES OF THE DIRECTORATE GENERAL FOR ENERGY AND TRANSPORT ON THE RIGHTS OF THE PASSENGERS IN INTERNATIONAL BUS AND COACH TRANSPORT

1. BACKGROUND

The Spanish National Organization of the Blind (ONCE) is a non-profit institution formed by all blind and severely partially sighted people in Spain.

ONCE's mission is to provide services to people with special needs stemming from blindness - whether this occurs from birth or through vision loss later in life, facilitating their full social integration.

ONCE is able to achieve its mission thanks to its participation in the Public Game Sector through the granting of an administrative concession to manage a national lottery in Spain called "Cupón" and, more recently, other types of lotteries. The income derived from these lotteries allows ONCE to look after the needs stemming from visual impairment of 66,000 plus members in the field of education, vocational training, employment, accessibility, culture, new technologies, sport and other fields.

Furthermore, ONCE contributes to the integration both of people with blindness and partially sighted as well as people with other disabilities in Spain. Hence, since 1988 our institution jointly provides similar support through its ONCE Foundation for Solidarity with Blind People in Latin America (FOAL) to more than three and a half million Spanish citizens with other disabilities.

Thus, ONCE and its Foundation give employment to over 91,000 people and almost 78% of those people have some kind of disability.

Abroad, and basically through its ONCE Foundation for Solidarity with Blind People in Latin America (FOAL), ONCE runs also some very important cooperation programmes addressed to improving the quality of life of other blind people in different parts of the world.

Finally, within the European Union, ONCE has been one of the most active social organizations in encouraging policies and programmes with positive results for people with disabilities. This work has been achieved in cooperation with the Public Institutions and, above all, with the European Organizations from the social sector to which ONCE belongs.

2. CONSULTATION ON THE RIGHTS OF THE PASSENGERS IN INTERNATIONAL BUS AND COACH TRANSPORT

From ONCE, we value very positively the opening of this process of consultation initiated by the European Commission, since it will allow us to know and to keep in mind the different interests and points of view of the various actors involved.

The new regulation intends to cover the rights of the people with reduced mobility, among which the people with disability are found. Therefore, the elaboration of a legislative proposal turns out to be vital to protect all needs and rights of passengers with special needs travelling by coach.

3. ONCE'S PROPOSALS



Bus and coach transport is one of the most widely used, and therefore remains the most important means of transportation available to the public, it holds a 9.5% share of all transport services within the European Union.

This fact implies necessarily the provision and cover of all those needs of specific groups such as those of people with disability in general and the blind or visually impaired in particular; therefore, there should be not, in any case, a restriction of the existing rights

Due to this fact, we propose from ONCE some measures to guarantee a correct attention to this community:

Ø PASSENGER ASSISTANCE

- From ONCE we understand that for all those passengers with some disability should be guaranteed an effective assistance all throughout the journey.
- This assistance, in no case, should increase the price of the passenger's ticket, being therefore free.
- It should not be required any legal notice that guarantee the effective assistance since in many occasions the displacements are decided in an immediate way.
- It should be permitted the transfer of all the equipment or material necessary for the absolute independence of the person with disability (that is to say, wheelchairs, guide dogs, canes etc). In case of damage to the material, the user should receive compensation by the damages caused.

Ø ACCESSIBILITY

It is essential to be able to guarantee the access to information all throughout the journey. In this sense, it is fundamental the following:

- a) The locating of the stop
- b) Identification of the line
- c) Waiting time in the arrival
- d) Identification of the entrance
- e) Information on the next stop
- f) Any essential information for the passenger.

For this we propose the following:

- a) The system should provide audio information on the aspects mentioned in the previous section.
- b) It should be guaranteed that the audio information provided inside and out of the vehicle be always the correct one.
- c) Give clear and concise information.
- d) That the given messages should be easily intelligible and with the possibility of adjust their volume according to the acoustic conditions of the environment.
- e) When open the doors, the bus of the line requested should produce an audio message, toward the outside, to allow the passenger to identify the line and to serve as a reference for the user.
- f) The system should be activated at passenger's request, confirming its activation, and to cease signalling after some time considered functional.
- g) The activation mechanism could be produced by means of a standard device.
- h) The sign range of action should seek the equilibrium between the maximum reach technically appropriate and the minimum in order to get a good directionality and to avoid the user disorientation (3 meters).
- i) It should be found a solution for the system to discriminate between different lines so that the user can decide easily the line that should receive the sign to come to a halt at the requested stop.



j) The system should be receptive to more than one simultaneous request, no matter whether it comes from the same user or various ones.

Ø DELAYS OR DENIAL OF TRANSPORT

- In no case it should be denied the transport to people with some kind of disability except for obvious reasons when the security of the passenger is in risk. In these cases, another optional means of transport will be provided or, where appropriate, he/she will be compensated.

Hoping that these considerations will be useful

Yours sincerely,

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