Regarding Clause 26.2 - The recommendation of Michael Small's report.

Mr Small's recommendation does not go far enough.

The submissions provide evidence that the ARA claim (stating specific model train which meets the requirements) is unjustifed as a blanket exemption.

The repsonse by the ARA amounts to

a) an unjustifiable hardship claim, which they have not claimed an exemption for, and so is irrelevant; and

b) claiming a blanket exemption - when proof is provided that a blanket exemption is unjustified when successful systems having been installed by major transport operators.

The ARA have clearly shown that they do not understand the technical details, and this is not a valid reason for claiming the exemption. This is particularly sad considering that the exemption has previously been granted, and demonstrates that they have made no effort to investigate these issues.

The recommendation should be provided for two years, subject to the following where any ARA member utilising this exemption :

i) where evidence exists that Hearing Augmentation cannot be installed due to interference; and

ii) that such evidence be provided (with full technical details) for every conveyance where the exemption is used; and

iii) that evidence be provided as to what effort is being made to resolve the technical problems for each conveyance.; and

iv) ensures equivalent access for people who are deaf or have a hearing impairment to information provided via the public address system

v) that the exact method of equivalent access be listed for each conveyance.

vi) the ARA fund an independant consultative group including technical experts and representatives from the disability sector and in particular from Deaf and hearing impaired community organisations to consider technical feasibility and Equivalent access issues and to provide a report and recommendations to the Commission by December 2016.

vii) all the above information be provided to the AHRC.

The information from the above will also provide valuable information for the committee to evaluate when looking at solutions.

Thank you for your attention to this matter.

Regards

Andrew Stewart