

Issues raised by industry stakeholders

Issue	Details/ Comments
Definition of Disabled/PRM	<ul style="list-style-type: none"> - Queries over precise definition – is it purely related to mobility issues? Position of obesity? Small children? - Operators would like to request proof of a passenger's PRM status (to avoid abuse). - Request for 'companion' fair and consistent.
Safety Derogation	<ul style="list-style-type: none"> - Vagueness of derogation could result in legal challenge. - What is a reasonable effort to make for re-routing (e.g. checking other airlines' safety rules) ? - Airlines seeking guidance on how JAR-OPS/EU-OPS relate to PRMs Regulation – clarification on whether airlines can continue to apply their own limits. - What status will ECAC guidance have? - What should the CAA enforce?
Transmission of Information	<ul style="list-style-type: none"> - Agents/Operators not passing pax details to airlines/airports. Need to apportion blame in prosecution. - Addition of airport in chain increases chance of transmission error. Need shared information systems/codes to include airports. - Length of time need to retain data. - Can airlines require passengers to confirm their need for assistance by telephone – issues around premium rate telephone lines ? - Data protection issues - encryption required ?
Airport Responsibility	<ul style="list-style-type: none"> - Which airports will have to publish service standards ? - Reg allows airports to sub-contract handling. Airlines would like the power to request 'self handling' but this 'opt-out' could impact on the effectiveness of the Regulation. - Different level of service desired by different airlines/ for different business models incl. access to retail.
Airport's Ground Handlers	<ul style="list-style-type: none"> - Interface between different service providers (i.e. rail network, multiple terminals). - Will users be consulted on new ground handling arrangements/ cost? How much advanced warning available? Role of Airport Consultative Committees.
Airport Charging	<ul style="list-style-type: none"> - Airlines expense may increase (airports pass costs to airlines and therefore may not secure the best value contract). - Additional charges for access to retail. - Where will airlines publish the annual overview of charges – will this be transparent to airlines ? Failure to do so should attract unlimited fine.
Training	<ul style="list-style-type: none"> - What sort of training required ? - Should enforcement be based on receipt of complaints that indicate lack of training?
Mobility Equipment	<ul style="list-style-type: none"> - Definition of mobility equipment and what is reasonable. - Effect of requirements on baggage policies re: hand luggage restrictions - Compensation for wheelchairs – what is DRC/CAA role if complaints received ? - Does a supply of oxygen constitute 'mobility equipment' – what should be

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	the DfT/CAA position on airline's current charging policies? Consistent policy sought for all carriers on carriage of oxygen/use of on-board oxygen.
Health and Safety	<ul style="list-style-type: none"> - Current H&S rules/ practices regarding handling pax and equipment (including wheelchairs in the hold) to be considered – airlines seeking published guidance on this i.e. weight of wheelchairs. Reg requires assistance to move to toilet but does this conflict with H&S ?
Seating	<ul style="list-style-type: none"> - Guidance sought on seat allocation and whether a charge for extra seats would be a breach of the Regulation.
Security	<ul style="list-style-type: none"> - Possibility of derogation in instances of heightened security/ contingency plan needed.
Communication	<ul style="list-style-type: none"> - Industry and pax to be made aware of responsibility. Use travel trade press and target non-ABTA agents. - Accessible formats – what is reasonable for websites, at airports, on board the aircraft?
PETS Scheme and Animal Reception Centres (ARCs)	<ul style="list-style-type: none"> - Assistance dogs must be carried, in accordance with DEFRA rules. Does this create an obligation to create an ARC at all airports ? Are all airlines serving airports with ARCs obliged to carry dogs ? - Passengers currently required to pay £50 to bring dog back into the UK – should they still have to cover this?
Complaints Handling / Enforcement	<ul style="list-style-type: none"> - Significant number of non-UK complaints possible as result of inconsistent enforcement across EU. - Clarify DBC/PRMs overlap and role of AUC (with DRC as complaints handling). Change to DRC when CEHR created. - Pre-prosecution procedure to be set down.