

December 28, 2017

Desk Officer
U.S. Department of Homeland Security/TSA
Via Email: dhsdeskofficer@omb.eop.gov

RE: TSA Customer Comment Card (OMB Control Number: 1652-0030)

The below organizations submit the following comments in response to the notice published by the Transportation Security Administration (TSA) on November 28, 2017. In its notice, TSA requested comments regarding a requested revision to TSA's currently approved Customer Comment Card information collection. Our comments will be limited to TSA's interest in providing people with disabilities the opportunity to submit online requests for TSA's assistance in transiting security.

We support TSA's proposal to add a Request for Assistance electronic form to its collection. Providing individuals with disabilities the opportunity to submit requests for assistance online will add a level of convenience to the requests and make it easier for such requests to be completed any time prior to 72 hours before a flight. It will also allow the individual who is requesting assistance to complete the form at his or her own pace and provide an alternative to calling TSA to provide the needed information. Some people with disabilities simply cannot call TSA to make a request for assistance. Thus, the electronic request option would make the request for assistance process more programmatically complaint under Section 504 of the Rehabilitation Act. To ensure access to the electronic form, however, it must meet requirements for accessibility under Section 508 of the Rehabilitation Act.

We urge TSA to follow up with passengers who submit the Request for Assistance form to ensure that the assistance was received and provided in an appropriate manner. This should also include the establishment of an American Sign Language hotline for deaf and hard of hearing consumers. Seeking requester feedback will increase accountability for the type of service provided. TSA should either include information on the form encouraging requesters to follow up by submitting either a complaint or compliment card to provide feedback on the service received. In the alternative, TSA could follow up with the requester and encourage the individual to provide appropriate feedback.

Thank you for the opportunity to provide comments regarding TSA's proposal. If you have any questions, please contact Heather Ansley, Associate General Counsel for Corporate and Government Relations with Paralyzed Veterans of America, at 202-416-7794 or by email at heathera@pva.org.

Sincerely,

American Association of People with Disabilities
Autistic Self Advocacy Network
Bazelon Center for Mental Health Law

Christopher & Dana Reeve Foundation
Disability Rights Education & Defense Fund (DREDF)
National Association of the Deaf
National Disability Rights Network
Paralyzed Veterans of America
The National Council on Independent Living
United Spinal Association