



ADVISORY CIRCULAR

GENERAL SERIES

Date 8/7/2008

GEN-02

**REGULATION (EC) No 1107/2006 OF 5 JULY 2006
CONCERNING THE RIGHTS OF DISABLED PERSONS AND
PERSONS WITH REDUCED MOBILITY WHEN TRAVELLING
BY AIR**

The pertaining of the Advisory Circular to a particular series is representative of the subject primarily dealt with. However, the applicability or not of the Circular to each subject (operators, managing bodies of airports, etc.) shall be deduced from its contents.

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1. PREAMBLE

On 5 July 2006 the European Parliament and the Council adopted Regulation (EC) No 1107/2006, below referred to as "the Regulation", concerning the rights of disabled persons and of persons with reduced mobility when travelling by air. These rules will go into effect as from 26 July 2008, except for articles 3, 4, 14 and 16 that went already into effect on 26 July 2007.

The Regulation is based on the principle that when travelling by air, disabled persons and persons with reduced mobility have the same rights as all other citizens to unrestricted travelling, to freedom of choice and to non-discrimination, same as in all other life situations. Therefore, disabled persons and persons with reduced mobility due to either disability, age or any other reasons will have the option to travel by air under conditions comparable to those of other citizens. Disabled persons and persons with reduced mobility will therefore be able to access air travelling without being refused transport on the grounds of their disability or lack of mobility, unless exclusion is justified on the grounds of safety and prescribed by law. Prior to accepting reservations from persons with disabilities or reduced mobility, air carriers, their agents and tour operators will have to make all reasonable attempts to verify the existence of any safety issues that would prevent the accommodation of these persons on the flights concerned.

The Regulation respects the fundamental rights and observes the principles recognized in particular by the Charter of Fundamental Rights of the European Union.

On 9 August 2007 the Ministerial Decree 24 July 2007 No 107/T was published in the Italian Official Journal No 184, general series. This Decree appoints ENAC as body in charge of enforcing the Regulation, according to Art.14 of the Regulation itself.

On 17 February 2007 the Law 6 February 2007, No 13 was published in the Italian Official Journal No 40, ordinary supplement No 41/L. Under Art.3, paragraph 1 it delegates the Government to adopt provisions concerning penalties for violations of Community Regulations that are in force when this Law goes into effect.

Until a specific Legislative Decree will be issued, the Law 6 February 2007, No 13 will determine in general the penalties provisions for violations, since this is a European Commission Regulation.

ENAC's task, brought on jointly with the Associations representing disabled persons and persons with reduced mobility, as well as with all the air transport stakeholders, to set out the objectives of this Circular that implements Regulation EC1107/2006, was aimed at

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establishing a procedure that would allow, in line with current laws, to achieve a homogeneous service from the entire national air transportation system, which would also guarantee effectiveness, efficiency, transparency and quality.

In order to offer to disabled persons and to persons with reduced mobility opportunities for air travel comparable to those of other citizens, the assistance to meet their particular needs shall be provided at airports as well as on board aircrafts, by employing the necessary staff and equipment. To facilitate social inclusion, this assistance shall be given to persons concerned at no additional charge.

Among all organizations operating in the air transport, it is fundamental to spread the awareness that meeting the needs of disabled passengers is both a personal responsibility and a responsibility of the organization itself; therefore staff training shall be based on this principle. At a personal level, it is not only important to be able to identify different types of disability, to know how to assist and how to communicate; it is as well crucial for each member to know how their role within the organization can affect the rights of disabled passengers. As an example, this concerns also designers of aircrafts and airports, in addition to airport managing bodies or air carriers' staff. It is thus the responsibility of the organization to ensure that the training related to disabilities is consistent with the responsibilities and the duties of each staff member and to ensure as well that at each organizational level, including the executive level, the responsibility to meet the needs of disabled passengers is fully undertaken.

In organizing the provisions of assistance to disabled persons and persons with reduced mobility, and the training of their personnel, airports managing bodies and air carriers shall comply with document 30 of the European Civil Aviation Conference («ECAC») part I, section 5, and its annexes (E, F, J, K, N) Re. [4].

This Advisory Circular provides interpretative material mainly for the industry, the air transport stakeholders such as airport managing bodies, air carriers, and companies providing ground handling services; it is not meant to provide information to passengers, who can instead obtain useful information on the Regulation and on their rights by consulting ENAC's website under the section related to the Charter of Rights of the passengers. A complaint form can also be downloaded from the same website.



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2. REGULATION REFERENCES AND EXPLANATORY MATERIAL

- [1] Regulation (EC) No 1107/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 July 2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air;
- [2] Regulation (EC) No 261/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 February 2004 that establishes common rules concerning compensation and assistance to air passengers in case of denied boarding, flight cancellations or long delays, and repeals Regulation (EEC) No 295/91;
- [3] ICAO Annex 9, Ch 8 Sect. H "Facilitation of the carriage of passengers requiring special assistance";
- [4] ECAC POLICY STATEMENT IN THE FIELD OF CIVIL AVIATION FACILITATION, ECAC.CEAC DOC No. 30 (PART I) Sect. 5, 10th Edition/December 2006 (available on website www.ecac-ceac.org);
- [5] AIRPORT VOLUNTARY COMMITMENT (available on website www.ecac-ceac.org);
- [6] AIRLINE PASSENGER SERVICE COMMITMENT (available on website www.ecac-ceac.org)
- [7] REGULATION (EC) No 1899/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 December 2006 (and Annex – Commercial Air Transportation (Aeroplanes) OPS 1);
- [8] ENAC reply to the Ministry of Transport DG/Air Navigation concerning on board acceptance of guide dogs, No 37623/CTN/DIRGEN dated 11 June 2007.

3. DEFINITIONS

This paragraph addresses those definitions in Art.2 of the Regulation, which require comments, particular specifications and/or evaluation in reference to other national laws.

Disabled person or person with reduced mobility:

- Disabled person or person with reduced mobility means any person whose mobility when using transport is reduced, as a consequence of any physical disability (sensory or locomotor, permanent or temporary) or mental disability or impairment, or any other cause of disability, or age, and whose condition requires adequate attention and the adaptation of the service provided to all passengers to meet his or her special needs. This definition focuses on the reduced mobility and on the specific needs of the passenger due to his/her

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disability or reduced mobility. This condition shall not be treated as a disease; therefore no medical certification referring to the disability shall be requested as a travel prerequisite.

In order to give adequate assistance to a disabled passenger or a passenger with reduced mobility, based on his/her specific needs, Doc. 30 of ECAC recommends that airport managing bodies and air carriers use standardized classifications and codifications, such as the ones listed under section 5 of the document.

Tour operator:

- an organizer or retailer, other than an air carrier, as defined by Directive 90/314/EEC article 2, (2) and (3).

Directive 90/314/EEC of the Council, of 13 June 1990, concerning package travel, package holidays and package tours, defines within Art. 2(2) the organizer as someone who organizes on an ongoing base package services and sells them or offers them for sale directly or through a retailer; and defines within Art. 2(3) the retailer as someone who sells or offers for sale package services offered by the organizer.

Managing body of the airport or managing body:

- a body whose objective, under national legislation, is to administer and manage airport infrastructures, to coordinate and control the activities of all existing operators in an airport or an airport system.

This definition is part of Art.2 of the Regulation, and it is similar to the one included in Art. 2 of L.D. 13 January 1999, No 18, which enforces Directive 96/67/EC, on unrestricted opportunity to access the groundhandling market at Community airports; and it is moreover compatible with the definition of Art. 705 of the Navigation Acts, amended with Legislative Decree No 96 of 2005.

The Navigation Acts specify as well that the managing body is authorized to perform its activities in line with Art. 705, compliant with safety technical standards, through a qualifying certificate granted by ENAC.

Airport user:

- a natural or legal person in charge of carrying passengers by air from or to the airport at issue.

The definition of the Regulation is similar to that in Art. 2 of L.D. 13 January 1999, No 18, which enforces Directive 96/67/EC, on unrestricted opportunity to access the groundhandling market at Community airports.



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Airport users committee:

- a committee of delegates of airport users or organizations representing them.

In accordance with this definition, the L.D. 13 January 1999, No 18, which enforces Directive 96/67/EC, on unrestricted opportunity to access the groundhandling market at Community airports, establishes at Art. 8 that within six months from the date the decree becomes effective, the managing body shall form a users committee for each airport, open to all carriers using the airport's services, either directly or through appointed organizations.

Air carrier:

- an air travel undertaking holding a valid operating license. In the European Union an air carrier is licensed by one of the Member States along with the provisions of regulation (EEC) No 2407/92 of the Council, of 23 July 1992, concerning issuing licenses to air carriers.

4. APPLICABILITY

The Regulation applies to disabled persons and to those persons with reduced mobility, such as the elders and those with temporary mobility impairment, whenever they use, or intend to use a commercial air service.

The Regulation applies to all flights from, or in transit, or in arrival at any airport of the European Union; furthermore, it applies to passengers departing from an airport of a third country and arriving at an airport of a Member State, when the operating carrier is a Community air carrier.

This Regulation does not affect the rights of passengers recognized by directive 90/314/EEC concerning package travel, package holidays, and package tours, implemented with L.D. 6 September 2005, No 206, "Consumer Code", that revokes L.D. 17 March 1995, No 111; and does not affect the rights established by Regulation (EC) No 261/2004 of 11 February 2004 that designates common rules in terms of compensation and assistance to passengers in case of denied boarding, flight cancellations or long delays.

Additionally, Art. 1 of the Regulation determines that the Regulation itself supersedes any conflicting disposition of directive 96/67/EC, on unrestricted opportunity to access the market of groundhandling of assistance at Community airports, implemented with L.D. 13 January 1999, No 18.



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5. PURPOSE

The purpose of this Advisory Circular is to provide to air carriage operators such as airport managing bodies, air carriers, and companies providing groundhandling of assistance, a means of interpretation and clarifications, as well as adequate tools to assess directions and limitations, to implement the Regulation. The topics mainly considered are those that require clarifying material, while more complete technical specifications on all different matters can be found in document No 30 of ECAC.

This Advisory Circular represent a means of compliance deemed acceptable by ENAC as the Enforcement Body of the Regulation, but obviously this is not the only possible mean of compliance, in fact other alternative methods can be suggested, that may show to be equally acceptable.

In order to guarantee a standard for the topics "Quality of provision of assistance" and "Staff training", specific guidelines attached to this Advisory Circular have been developed in collaboration with the Associations representing disabled persons and persons with reduced mobility, as well as with the Associations representing air travel Operators.

The procedures to ascertain violations and issue penalties are established in a separate advisory circular.

6. REQUIREMENTS EFFECTIVE AS FROM 26 JULY 2007

Article 3

This requirement applies to air operators, their agents and tour operators, and establishes that the acceptance of a passenger's reservation cannot be refused and boarding denied based on grounds of disability or reduced mobility. This applies to all flights to or from Community airports and as long as the concerned passenger holds a valid ticket and reservation.



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Article 4

According article 4 air operators, their agents or tour operators may refuse accepting a reservation or deny boarding of a disabled passenger or a passenger with reduced mobility for safety reasons, specifically:

- In order to meet applicable safety requirements established by international, Community or national law, or by the civil aviation authority that issued the operating certificate to the air carrier;
- If the size of the aircraft doors make it impossible to board the passenger.

In case of denied reservation or boarding due to one of the above reasons, the air carrier, its agent or the tour operator shall offer another option or the right to reimbursement to the disabled person or person with reduced mobility as well as to any travelling companion.

Whenever an exception is applied compliant with Art.4 paragraphs 1 or 2 the disabled person shall be informed immediately and the reasons shall be fully disclosed; in this case the passenger can ask the air carrier, its agent or the tour operator to provide a written statement and this shall be made available within five working days following the request.

Self-reliance and the need for an accompanying person

The air carrier may request that the disabled person or the person with reduced mobility travels with a companion who can provide assistance. This may be requested particularly when it is evident that the person is not self-reliant when performing any of the following:

- Breathing: the passenger should not be reliant on supplementary oxygen.
- Eating: the passenger should be capable to feed him-/herself. Cabin crew could still be expected to assist with opening food containers and describing catering arrangements to blind people.
- Basic moving: the passenger should be capable to move from a passenger seat to an on-board wheelchair.
- Communicating: the passenger should be able to communicate with the crew and understand their advice/instructions.
- Using lavatories: the passenger should be capable to use the lavatories unaided. Cabin crew can be expected to assist a passenger to move through the cabin in an on-board wheelchair.
- Taking medications: the passenger should be capable to administer his/her own medications and treatments.



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Whenever a passenger is not self-reliant and is unable to perform any of the above and a travel companion is requested, the air carrier should consider offering a discounted ticket to the companion (as recommended by Doc. 30 ECAC par. 5.2.4.2.)

When a passenger with severe disability is assisted by a well trained travel companion able to lift and move the disabled passenger, the air carrier shall not impose its own provision of assistance.

The assignment of a specific seat, even if pre-assigned, can never be guaranteed, both for the disabled person or person with reduced mobility and for the travel companion, due to operational difficulties, as would be the case of a change of aircraft; nonetheless the Regulation requires that the air carrier makes all reasonable attempts to provide the reserved seats.

The Medical Certificate

The definition of disabled passenger or passenger with reduced mobility, as reported at par. 3 of this advisory circular, is based on the diminished mobility and the resulting special assistance requirements.

The passenger's declaration of disability or reduced mobility shall only be considered to assess the request for assistance and shall not be used to decide if a medical certificate authorizing air travel is required. As confirmed by Doc. 30 of ECAC and by IATA Resolution 700 (June 2002) a medical certificate is required only for MEDA classified passengers.

In general, the Airline or its authorized representative may request a medical certificate when information about a passenger is received concerning one of the following:

- The passenger has an infectious disease, or
- The passenger is affected by an illness or disability that can result in behaviour or physical condition that could have a negative effect on other passengers or crew members, or
- The passenger could put the flight safety at risk, including route changes or unplanned landings, or
- The passenger requires medical assistance and/or special medical equipment during the flight, or
- The passenger's medical condition could worsen during or because of the flight.

We bring the attention upon the fact that, considering that the air carrier bears the responsibility for the safety of the operations and for taking all necessary related actions, besides making decisions based on having received information as above described, the air



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carrier or its authorized agent receiving the travel request, may rightfully ask for a medical certificate also whenever they have well-grounded suspicions about the medical condition of any passenger.

The air carriers and their agents shall use specific forms to collect information, in order to standardize and homogenize the classification of passengers requesting assistance, with the purpose of implementing provision of assistance that can best meet the passenger's needs.

7. SAFETY POLICIES OF AIR CARRIERS

After July 2008, all commercial travel operators in Europe will have to comply with the OPS 1 requirements, derived from those of JAR-OPS 1 and published as annex to the Regulation (EC) No 1899/2006 of the European Parliament and the Council of 12 December 2006, which amends Regulation (EEC) No 3922/91 of the Council, concerning the harmonization of technical rules and administrative procedures in the civil aviation sector.

The Community air carrier holds an Air Operator License (AOL) received after demonstrating compliance of its organization with the JAR-OPS 1 requirements or, in the future, with the OPS 1 requirements. For the purpose of this paragraph, the terms air carrier and operator will be used indifferently.

Under Article 4(1)(a) of the Regulation, an air carrier has to refuse to embark a disabled passenger or a passenger with reduced mobility for safety reasons, that is to say in order to comply with either JAR-OPS 1 or future OPS 1 requirements.

In the past, it hadn't been necessary that the Authority impose to limit, on the Manual of the operator (and other publications) the maximum number of PRM passengers (Passengers with Reduced Mobility) that an operator could carry in the same flight, except in cases where the operator requested to exceed the number allowed by JAR-OPS 1/ OPS 1 and therefore not respecting safety regulations.

An operator should be prepared to carry as many PRM passengers as it can in accordance with JAR-OPS 1/ OPS 1. In summary, the foremost effect of the Regulation should be that of closing the gap between the lowest number of PRM passengers that the operator is prepared to carry, and the highest number that can be carried according to JAR-OPS 1/ OPS 1 requirements. The operator will not be able to choose arbitrarily the maximum number of PRM



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passengers it can carry on the same flight, if the number is lower than the maximum allowed by JAR-OPS 1/ OPS 1 requirements.

The maximum number of PRM passengers allowed on the same flight by JAR-OPS 1/ OPS 1 regulations depends on a certain number of factors, such as the type of aircraft and its configuration, the type and degree of mobility impairment of the PRM passengers requesting boarding, as well as the number of passengers with normal mobility.

It is not possible for the Civil Aviation Authority to indicate a fixed maximum number of PRM passengers allowed on the same flight for each type of aircraft or for each possible configuration; this can only be done by the operator who therefore takes this responsibility.

In general, the maximum number of PRM passengers that can be carried in compliance with JAR-OPS 1/ OPS 1 requirements is significantly higher than the average number of PRM passengers actually requesting to board the same flight. For the larger aircrafts, it is truly unusual that the operator denies embarking a PRM passenger due to having reached the limit established by JAR-OPS 1/ OPS 1 requirements; while restrictions on smaller aircrafts may be related to the size of the doors, to the stairway or to the position and size of the emergency exits.

It is the operator's responsibility to comply with the JAR-OPS 1/ OPS 1 requirements and with the Regulation; it is therefore up to the operator to decide the maximum number of PRM passengers it can carry on the same flight, for each aircraft and each configuration of its fleet. Therefore, the operator will be able to deny embarking a PRM passenger on the grounds of Art. 4(1)(a) of the regulation, only if carrying this PRM passenger would mean exceeding the limit specified by JAR-OPS 1/ OPS 1 regulations, or if it would not conform to the conditions and procedures required to follow the same regulations.

The air operator shall therefore define its safety policies in reference to PRM passengers, compliant with JAR-OPS 1/ OPS 1 regulations and based on the configuration of its aircrafts, by specifying procedures and any restrictions, and by disclosing them to the public in an accessible format. This information should also specify any restriction concerning carriage of mobility devices.

8. PASSENGERS' RIGHTS IN CASE OF REFUSAL

If a reservation is refused for safety reasons, the air operator, its agent or the tour operator shall make all reasonable attempts to offer an alternative to the passenger.



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In case of denied boarding of a passenger because of disability or reduced mobility, the passenger shall be assisted in accordance with Regulation (EC) No 261/2004 Art. 8, by offering him or her the choice between the full reimbursement of the ticket and the right to a return flight, in case of a flight with multiple stops, or else an alternative flight. The right to a return flight or to an alternative flight is conditional on the subsistence of mandatory safety conditions.

In order to comply with safety requirements, it may occur that the air operator, its agent or the tour operator requests that a travel companion accompanies the passenger and provides the necessary assistance.

The safety regulations that an air operator applies to the carriage of disabled passengers and passengers with reduced mobility, shall be made available in accessible formats for each type of disability and available at least in each of the languages used for the other passengers.

The details shall be made available concerning restrictions affecting carriage of passengers or of mobility devices. Similarly, tour operators shall disclose this information for package trips.

In case the air operator, its agent or the tour operator resorts to conditions of exception for safety reasons, it shall inform the passenger immediately, providing the reasons for the refusal. The passenger may request a written statement that, in line with the Regulation, shall be made available within five working days.

9. REQUIREMENTS EFFECTIVE AS FROM 26 JULY 2008

As from 26 July 2008 the Regulation will be entirely into force, with the purpose of guaranteeing that disabled passengers and passengers with reduced mobility can access air travelling and that they receive the assistance they need; and in particular the following shall be ascertained:

- at the airport, for departing disabled passengers and passengers with reduced mobility, that they receive assistance from the designated departure point to their assigned seat on the aircraft;
- at the airport, for arriving disabled passengers and passengers with reduced mobility, that they are assisted from their seat on the aircraft to the designated arrival point;
- at the airport, that the designated points of departure and arrival are clearly indicated, at which disabled passengers and passengers with reduced mobility can communicate their arrival at the airport. These designated points, to be selected both inside and outside terminal buildings, in appropriate areas under direct control of the managing

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body, shall be located in consideration of the size and structure of the airport at the points of interchange that connect to railroad stations, parking lots, buses, taxis and car rentals;

- for airports with a total annual traffic of over 150000 commercial passengers, that the managing body of the airport set and publishes the assistance quality standards, compliant with Art. 9, and in collaboration with the air operators and the organizations representing disabled persons and persons with reduced mobility. The managing body is responsible for the method of the publication, particularly in terms of timeframe and the means to make these standards accessible. The guidelines for the elaboration of the services quality standards are available in annex 1 of this advisory circular.
- that the costs for the assistance are not charged to the disabled persons and persons with reduced mobility, and that they are instead connected to the average number of passengers carried from and to that airport by the air carrier;
- that in order to finance the provision of assistance, the managing body of the airport can establish a specific fee, based on transparent costs, and in collaboration with the air carriers;
- that the managing body of the airport may provide assistance exceeding the standard published; and that in this case any fee increase is also based on transparent costs and agreed upon with the air carrier that requested it;
- that the managing body keeps separate accounting of the provision of assistance to disabled persons and persons with reduced mobility;
- that the managing body makes available to the operators an annual report stating fees collected and costs sustained to provide assistance to disabled persons and persons with reduced mobility;
- that the managing body makes available to the appointed body, namely ENAC Directorate for Economic Regulation, an annual report stating fees collected and costs sustained to provide assistance to disabled persons and persons with reduced mobility; the Directorate for Economic Regulation of ENAC will verify congruity;
- that the managing body effectively guarantees the assistance to disabled persons and persons with reduced mobility and that it fulfils this obligation either directly or by assigning it to a third party, which could also be the air operator or any other existing organization in the airport. In accordance with the Regulation the managing body may stipulate service contracts, with approved and published quality levels, with one or



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more parties, and this either on its own initiative or following the request of the air carrier. The managing body is responsible for the provision of assistance and the conformity with the established quality levels in any case, both when providing these services directly as well as when assigning them to third parties¹;

- that the passengers may notify without difficulty their need for assistance upon making the reservation and the purchase, and that all information concerning their requests is forwarded to the air operators and to the managing bodies of the airports, in order to guarantee the good organization of the trip. This requires that at the time of the reservation or purchase, the air carriers, their agents and the tour operators are ready to gather the necessary information required to organize the provision of assistance, and that they forward this information to all concerned organizations, namely the air carrier that accepts the reservation or sells the ticket, the operating air carrier and the managing bodies of the airports involved that belong to any of the Member States. Considering that the Regulation applies also when the departure is from an airport of a third State, with arrival at an airport in the territory of a Member State and the flight is operated by a Community air carrier, we need to specify that the forwarding of the necessary information and the request for and/or the arrangement of the provision of assistance at the third State airport, is the responsibility of the air carrier.
- that upon request notified to the air carrier, its agent or the tour operator, the passenger may travel with the guide dog, compliant with the national policies concerning on board carriage of assistance dogs (ENAC Letter to the Ministry of Transport DG/Air Navigation on the matter of on board carriage of guide dogs, Re. [8].
- that the personnel directly involved in providing assistance to disabled persons and persons with reduced mobility is well-informed about the needs related to the different situations of disability, and that their training does include understanding about disability and equal rights. The guidelines to implement a plan and an educational program are in appendix 2 of this memorandum.
- that the provision of assistance granted by the Regulation is given with the quality level determined by the managing body, on condition that the passenger appears on time at

¹ Regulation EC1107/2006 does not require a particular certification for the organization of the sub-contractor that provides assistance at the airport to disabled passengers and to passengers with reduced mobility and, specifically, it does not prescribe for it to hold a certification conformant with ENAC Regulation "License for provision of ground airport assistance services" Ed. 2 of 19/12/2006.



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the designated points and at the check-in, based on the schedule established by the air carrier, its agent or the tour operator and provided in advance in writing. This implies that upon making the reservation or purchasing the ticket and requesting the provision of assistance, the passenger obtains all the information and the applicable conditions in order to take advantage of the assistance.

10. SUPERVISION ACTIVITY BY ENAC

The Airport Office of ENAC, competent to oversee the airport accountable for a violation, proceeds officially or based on a report/complaint to ascertain the violation; it collects information, performs inspections, carries out surveys, in order to substantiate and record the violation of the passenger's rights as provided in the Regulation.

ENAC is not in charge of dealing directly with complaints when the alleged violation concerns managing bodies or air carriers belonging to another Member State; in this case ENAC is required to forward the complaint to the Regulation's enforcement body of that Member State.

11. HANDLING OF COMPLAINTS

Both the airport managing body and the air carrier shall provide a procedure to handle passengers' complaints in case of alleged violations of the Regulation, and they shall make available and accessible the information on the formalities to be followed to make the complaint itself.

ENAC, as body in charge of enforcing the Regulation, compliant with Art. 14, is responsible for handling any complaints related to alleged violations of the Regulation, compliant with Art. 15.

The Regulation determines that a passenger, who deems that a violation occurred, may send a complaint to the managing body of the airport or to the air carrier (depending on the case) and may send the same as well to ENAC as Body in charge of enforcing the Regulation EC1107/2006. The Regulation specifies that the decision and the act of sending the complaint to the managing body or to the air carrier are independent from the decision to send it to the Body in charge of the enforcement; indeed the functions are different and consequently the purpose of sending the complaint to the managing body or to the air carrier is different from that of sending it to the Authority, therefore it is up to the passenger to decide to send them concurrently or else wait for the outcome with the former before sending it to the latter.



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Complaints should be sent by mail to the ENAC office "Charter of Rights" or electronically to the e-mail address: cartadiritti@enac.rupa.it

ENAC provides accessible information on the rights of disabled passengers and of passengers with reduced mobility, as well as on the procedures to follow to make a complaint, on the website: www.enac-italia.it

In case of a complaint the appointed ENAC structure collects and examines the data connected to the alleged violation and opens the investigation on said violation.



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12. STARTING DATE

This advisory circular is effective as from 26 July 2008 and cancels and replaces advisory circular ENAC EAL-11 of 17 December 2003.

Director General
Cap. Silvano Manera

Annex 1 – Quality standards for assistance

Annex 2 – Training of personnel assisting PRM passengers



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ANNEX 1

Quality standards for assistance

Introduction

1. Provision of assistance at the airport to disabled passengers and passengers with reduced mobility, under the responsibility of the managing bodies of the airport
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3. Quality factors and indicators for the provision of assistance to disabled passengers and passengers with reduced mobility
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Introduction

Art. 9 "Quality standards for assistance" of Regulation EC 1107/2006 prescribes that the managing bodies of airports with an annual traffic above 150000 passengers shall establish the quality standards for the assistance provisions as listed in Annexes I and II of the Regulation, in collaboration with the airport users and the organizations representing the rights of disabled passengers and passengers with reduced mobility.

The purpose of this annex to the Advisory Circular GEN 02 is to provide guidelines to managing bodies to determine the minimum quality standards of the services offered, possibly to be included in the contracts stipulated between managing bodies, groundhandling companies, and air carriers. The managing bodies are required by the Regulation to publish its quality standards.

The minimum standards of quality for provision of assistance are determined based on definitions in Annexes I and II of the Regulation, not in reference to the quality or condition of the infrastructures of the airport or the configuration of the cabin of the aircraft. As a matter of fact, Regulation EC1107/2006 determines the rights of disabled passengers and passengers with reduced mobility, and to meet these rights it identifies the responsibilities of the air operators, but it does not compel to modify the infrastructures of the airport or modify the aircrafts, leaving to other Regulations and/or Laws to deal with these aspects.

In particular, we draw attention to the circumstances of the infrastructures, which remain under the exclusive responsibility of the managing bodies of the airport, and that condition the arrangement of the services and therefore their cost; for instance, the existence of tactile trails and relief maps in the airport would increase the autonomy of a sight-impaired passenger, thus limiting the need for the accompanying service; this way, when sightless and sight-impaired persons declare being sufficiently autonomous and tactile trails and relief maps are available to lead them from their location to the services available in the airport, assistance will not be required during the waiting time. Obviously this example can be extended to other types of disability and in general we can state that the more the autonomy of a disabled passenger or a passenger with reduced mobility can be increased, by improving the infrastructures as already required by other Laws and/or Regulations, the more the need for assistance and related costs can be reduced.

No less important than its financial aspect, the value of the concept of autonomy is in the fact that it gives disabled passengers the opportunity to exercise their right to mobility in a way that is more similar to that of the other passengers; the planning and arrangement of provision of

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assistance shall focus on this concept. Therefore, upon realizing the difficulties in converting this aspect into an objectively measurable quality factor, it becomes necessary to solicit managing bodies of airports and air carriers to take this aspect into account when they structure their provision of assistance and to offer therefore, whenever possible, the opportunity to choose between using the provision of assistance or proceed autonomously instead. In general, the standards of the provision of assistance shall encompass the minimum levels of quality for these services, the whole system of operating procedures (including standard and emergency procedures, and contingency plans), the conditions of provision of services and the measures for the handling of complaints.

The outline offered in this annex is structured in reference to the framework used for the Chart of Services of each airport; therefore it includes 6 quality factors for which the indicators have been identified. 2 out of these 6 identified quality factors are applicable only to the managing body, 2 only to the air carrier, and 2 to both organizations; consequently, the indicators concerning quality factors applicable to the managing body are 11 and those applicable to the air carrier are 8. The services for disabled passengers and passengers with reduced mobility are defined in paragraphs 1 and 2 that follow, and their quality factors and related indicators are identified in paragraphs 3 and 4.

It is important to specify that the quality factors of the provision of assistance suggested in this document include the service standards defined in Doc. 30 ECAC, as well as other aspects deemed useful to ensure that the provision of assistance meet a quality level considered acceptable by users. The discussion held with the Associations representing the rights of disabled passengers showed clearly that the time by which the provision of assistance are given is only one of the significant parameters to assess the quality of these services; in fact the quality of the services is assessed also in terms of the adequate behaviour of the staff and of the completeness of information, because these factors give a disabled person or a person with reduced mobility the sense of being properly assisted, thus being able to overcome the fear of missing their flight.

Indicators can be related to quantity, therefore measurable, or to quality, therefore non measurable, but subject to evaluation, in some cases within the organization, in others outside of it, for instance by assessing passengers' perception of the provision of assistance being considered (perceptive indicators); this annex establishes quantity indicators and quality indicators evaluated within the organization, and confers to the managing body or to the air



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carrier the possibility of defining and using perceptive indicators to assess and verify periodically the quality as perceived by the passengers.

1. Provision of assistance at the airport to disabled passengers and passengers with reduced mobility, under the responsibility of the airport managing bodies

The services at the airport to which disabled passengers and passengers with reduced mobility are entitled, are defined in Annex I of the Regulation EC1107/2006 and basically they allow to:

- communicate their arrival at the airport and request for assistance at the designated points inside and outside terminal buildings, as per article 5,
- move from a designated point to the check-in counter,
- comply with boarding formalities for the passenger and the luggage,
- proceed from the check-in counter to the aircraft, after complying with immigration, customs and security formalities,
- board the aircraft by using lifts, wheelchairs or other means of assistance specifically required,
- proceed from the door of the aircraft to the seat,
- put away and retrieve carryon luggage and any wheelchair or other embarked device,
- proceed from the seat to the door of the aircraft,
- disembark from the aircraft by using lifts, wheelchairs or other means of assistance specifically required,
- proceed from the aircraft to the luggage pickup area, retrieve the luggage and complete immigration and customs inspection
- proceed from the luggage pickup area to a designated point,
- board a connecting flight, if in transit, with the assistance provided at and between terminal buildings, based of specific needs,
- go to the toilet facilities when needed,



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- be able, for the disabled passenger or the passenger with reduced mobility requesting it, to be assisted at the airport by one's own travel companion², including when embarking or disembarking,
- be given assistance on ground for all mobility devices needed, including electric wheelchairs, for which a forty-eight hours notice is required, and is allowed based on space availability on board the aircraft, as well as in compliance with regulations concerning dangerous goods,
- obtain a temporary replacement of any damaged or lost mobility device, bearing in mind that the replacement with a comparable device may not always be feasible,
- be given assistance on ground for approved assistance dogs, when possible,
- be able to access information about flights.

2. The provision of assistance on ground and on board to disabled passengers and passengers with reduced mobility, under the responsibility of the air carriers

Some of the services for disabled passengers and passengers with reduced mobility are under the responsibility of the air carrier; specifically, point of sale services such as reservations, ticket purchases, requests for information, requests and management of provision of assistance, as well as provision of assistance required on board.

These are defined based on Annex II, but not only, in fact, some of them are directly mentioned in specific articles of the Regulation; in general, these are provisions and measures necessary to assist for the following:

- be able to communicate one's needs in terms of assistance (compliant with IATA/ECAC codes) upon making the reservation
- be aware of safety requirements applied by the air carrier in reference to carriage of disabled persons and persons with reduced mobility, as well as of any restrictions affecting their carriage or that of mobility devices
- be able to access flight information and information on the provision of assistance available, as well as be able to use today's technology to make reservations, namely internet, e-mail, etc

² *The travel companion is the person that travels with the disabled passenger or the passenger with reduced mobility.*



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- be allowed to travel with recognized assistance dogs, in respect of national regulations
- be allowed to carry, in addition to medical equipment, no more than two mobility devices (pairs of crutches, etc. count as one device) per each disabled person or person with reduced mobility, including electric wheelchairs, with a forty-eight hours prior notice, based on availability of space on board and in respect of regulations concerning dangerous goods
- have access to relevant flight information
- request and if possible be granted specific seats with regard to the particular needs of the disabled person or the person with reduced mobility, in respect of safety requirements and based on availability
- be assisted in reaching toilet facilities, whenever needed
- request and if possible be granted that any accompanying person travelling with the disabled passenger or the passenger with reduced mobility, may sit next to the disabled passenger or the passenger with reduced mobility³
- be given the on board assistance, for which the air carrier is responsible, necessary to embark on any connecting flight (for instance coordinating with the managing body of the transit airport in case of delay).

3. Quality factors for the provision of assistance to disabled passengers and passengers with reduced mobility

The quality factors selected are hereby listed. Some of them are clearly referred to ground services exclusively under the responsibility of the managing body of the airport, others are solely applicable to on board services, therefore under the responsibility of the air carrier, while others, instead, refer to services that are under the responsibility of either the managing body or the air carrier:

- **Efficiency of the provision of assistance:** this quality factor refers to the services at the airport provided by the airport managing body (directly or through a sub-contractor) and its evaluation is given by measuring the waiting times, in reference to ECAC Doc. 30. Consequently, the provisions specified in the same document have been adopted to set the goals. This decision, which we believe will be made as well in the other

³ The companion, in case the disabled passenger or the passenger with reduced mobility is not autonomous, shall sit next to the passenger or at least as close as possible, according to the cabin configuration and the air carrier's safety regulations.



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States of the European Community, will allow a direct comparison of data received from the other Community airports; obviously the managing body of the airport is free to include other indicators to monitor all phases of the provision of assistance.

- **Personal safety, for each provision of assistance, on ground and on board:** this factor applies to services both on ground and on board, with specific differences. The safety of a disabled passenger or a passenger with reduced mobility, when receiving the required assistance, mainly depends on the competency of the person who provides assistance and on the adequacy of the equipment utilized. To determine this quality factor, this document provides measurable quality indicators based on the assessment of the organizational procedures implemented to guarantee the safety of disabled passengers and passengers with reduced mobility when receiving assistance;
- **Information at points of sale:** at the points of sale of air carriers and tour operators, all information concerning the available provision of assistance as well as safety policies established by each air carrier for carriage of disabled persons and persons with reduced mobility, shall be provided in the most exhaustive and accessible manner. This information shall be available and accessible at all stages of ticket purchasing, that is when consulting schedules and offers, when making the reservation and upon purchasing the ticket;
- **Information at the airport:** all information provided at the airport concerning flights, delays, baggage claim, provision of assistance available, and all other airport services shall be provided in the most exhaustive and accessible manner. This information shall be made available in specific areas of the airport, including designated areas of arrival and departure;
- **In flight information:** all information concerning emergency procedures and on board provision of assistance, shall be provided in the most exhaustive and accessible manner;
- **Communication with passengers:** both the air carriers and the managing bodies of the airports shall implement a means of communication with passengers in reference to this Regulation, in order to receive requests for information as well as any complaints. The availability of a channel of communication with passengers, in addition to the whole set of information on the provision of assistance, is considered a factor of quality in this document.



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4. Indicators and related minimum levels applied to provision of assistance quality factors

For each of the quality factors defined at paragraph 3, the following quantity or quality indicators, depending on the case, are available; furthermore each indicator comes with an expected target; the target of quantity indicators is numerical, therefore measurable, that of quality indicators cannot be expressed numerically and is, therefore, determined through assessments and control actions that allow to demonstrate the control of the indicator being considered. The quality targets defined in this annex, unless otherwise specified, shall be considered obtainable as long as the passenger requests the provision of assistance respecting time requirements and procedures for the reservation and the request for assistance and, furthermore, shows up punctually at the check in. It is the responsibility of the managing bodies and of the air carriers to provide complete information, accessible to all passengers with all types of disabilities, on conditions and procedures for the reservation and the request for assistance, as well as on the time requirements for check in (and at any designated points), in order to obtain provision of assistance with the expected quality level.

Each provision of assistance is given following a request (either at the time of the reservation or, otherwise, in the opposite case, in the absence of a timely reservation made in the due time constraints), therefore, it is assumed that each one can be traced, which implies that all data of a provision can be recorded and, therefore, its services measured at any rate; this further entails that the collection of indicators shall apply to each occurring provision of assistance. The period designated for the collection to be used for statistical purposes shall be chosen based on the volume of traffic of a given airport; in fact, it should be considered that an airport with low volume of traffic requires a longer period of time to collect relevant data, compared to an airport with higher traffic.

Consistently with the provisions of ECAC Doc. 30, the fixed indicators shall be deemed as the lowest and, obviously, they can be exceeded by the managing body of each airport based on its characteristics.

1. Efficiency of the provision of assistance:

For departing passengers holding reservation



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- **Indicator:** waiting time to receive assistance, at one of the airport designated points, after notifying one's presence;

Target:

- 80% of passengers should not wait more than 10 minutes,
- 90% of passengers should not wait more than 20 minutes,
- 100% of passengers should not wait more than 30 minutes;

For departing passengers without reservation

- **Indicator:** waiting time to receive assistance, at one of the airport designated points, after notifying one's presence;

Target:

- 80% of passengers should not wait more than 25 minutes;

For arriving passengers holding reservation

- **Indicator:** waiting time to receive assistance, at the gate/aircraft point, after the last passenger's disembarking⁴;

Target:

- 80% of passengers should not wait more than 5 minutes,
- 90% of passengers should not wait more than 10 minutes,
- 100% of passengers should not wait more than 20 minutes;

For arriving passengers without reservation⁵

- **Indicator:** waiting time to receive assistance, at the gate/aircraft point, after the last passenger's disembarking;

Target:

- 80% of passengers should not wait more than 25 minutes,

In general

- **Indicator:** number of passengers who arrive at the aircraft on time for the pre-embarking and departure compared to the total number of passengers who requested assistance;

Target: 100%.

Consistently with the provisions of ECAC Doc. 30, adequate waiting areas shall be available for waiting time longer than 15 minutes

⁴ The definition of this indicator is subjected to the assumption that in general disabled passengers and passengers with reduced mobility disembark after all other passengers.

⁵ In case of passengers without reservation, the airport managing body and the air carrier shall do all that is possible to provide the assistance requested; however, obviously the same performance that would have been offered, had the reservation be made according to the Regulation, cannot be guaranteed.



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2. *Personal Safety:*

- **Indicator:** Existence of procedures that guarantee the use of adequate, in good state equipment for each operation (procedure of acquisition, verification and proper use in each operation);
Target: this circumstance doesn't allow for a numeric target, it is however necessary to verify that the above procedures are effective and implemented;
- **Indicator:** Existence of procedures that guarantee the employment of well trained personnel for any provision of assistance (in normal conditions and in case of emergency, on ground and on board);
Target: this circumstance doesn't allow for a numeric target, it is however necessary to verify that the above procedures are effective and implemented;

3. *Information at points of sale:*

Basic information on provision of assistance, its reservation and request procedures, as well as on safety policies of each air carrier shall be made accessible; specifically, accessibility shall be granted with reference to sensory disabilities (visual and auditory) as well as mobility disabilities.

- **Indicator:** Accessibility: quantity of basic information accessible to passengers with either sensory, either mobility disabilities as compared to the total quantity of available basic data;
Target: this number shall aim at reaching 100%;
- **Indicator:** Completeness: number of available services, and any restrictions or conditions for which accessible instructions and information do exist as compared to the total number;
Target: this number shall aim at reaching 100%;

4. *Information at the airport:*

Information essential to know, in order to request provision of assistance (at the designated points), and to obtain flight information, utilize airport services (bars, restaurants, etc...), get information on luggage, shall be accessible to persons with different types of disability, specifically accessibility shall be guaranteed in case of sensory (visual and auditory) and mobility disabilities.



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- **Indicator:** Accessibility: quantity of basic information accessible to passengers with either sensory, either mobility disabilities as compared to the total quantity of available basic data;
Target: this number shall aim at reaching 100%;
- **Indicator:** Completeness: number of available services, and any restrictions or conditions for which accessible instructions and information do exist as compared to the total number;
Target: this number shall aim at reaching 100%;

5. *In flight information:*

Information essential to know, in order to request provision of assistance (on board), and obtaining emergency procedures information (briefing, safety equipment) shall be accessible, specifically shall be guaranteed either in case of sensory (visual and auditory) and either in case of mobility disabilities.

- **Indicator:** Accessibility: quantity of basic information accessible to passengers with either sensory, either mobility disabilities as compared to the total quantity of available basic data;
Target: this number shall aim at reaching 100%;
- **Indicator:** Completeness: number of available services, and any restrictions or conditions for which accessible instructions and information do exist as compared to the total number;
Target: this number shall aim at reaching 100%;

6. *Communication with passengers:*

- **Indicator:** number of responses within the established time compared to the number of requests for information (the Regulation allows a limit of five days for an air carrier to motivate a denied embarking)
Target: this number shall aim at reaching 100%;
- **Indicator:** number of complaints compared to the total traffic of disabled passengers and passengers with reduced mobility (this indicator, suitably adapted, applies both to the air carrier and to the managing body of the airport);
Target: this number shall aim at reaching 0%.



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5. Monitoring of performances and of the quality standard of the assistance

The managing body of the airport and the air carrier shall perform scheduled (on a regular basis) monitoring activities (review/audit) of the services provided, to verify that the established standards of quality are complied with.

The concept of services quality standards refers either to the operational procedures as well as to the minimum level of quality of the provision of assistance, agreed upon when signing the assistance supply contract.

The organizations that provide assistance shall in their turn arrange an internal monitoring system to assess performance of services, and they shall also be able to provide data, when requested by the managing bodies of the airports.

Systematic monitoring of performances of provision of assistance shall be integrated also with activities of direct verification of quality of services as perceived by passengers.

6. List of Associations of disabled persons and persons with reduced mobility that contributed to elaborate this annex

1. Associazione Disabili Visivi
2. Assofly
3. Associazione Sipuò
4. CID.UE
5. CND
6. FAND
7. FISH
8. I.LI.TEC
9. Lega Arcobaleno
10. Sunfly

7. Reference documentation

- [1] ECAC/CEAC Doc. 30 Part I, Section 5 and Annexes E, F, J, K, N
- [2] Health and Safety Executive UK - SIM 05/2007/07, Manual handling risks during assistance of disabled passengers boarding or disembarking aircraft



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ANNEX 2

Training of personnel assisting PRM passengers

Introduction

1. Personnel required to be trained
2. Training program for personnel dealing directly with the travelling public
3. Training program for personnel in charge of providing direct assistance
4. An example of training program
5. List of Associations of disabled persons and persons with reduced mobility that contributed to elaborate this annex
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Introduction

Art. 11 "Training" of Regulation EC 1107/2006 establishes that both the air carriers and the managing bodies of the airports shall ensure that their personnel, as well as that of any sub-contractor providing assistance to disabled passengers and passengers with reduced mobility, have the ability to meet the needs of these passengers based on each one's disability.

The air carriers and the managing bodies shall train all their personnel who deal directly with the travelling public, on the different types of disability and their specific needs, and on disability-equality awareness; and shall also provide disability-related training to all new employees, furthermore assuring refresher training courses when appropriate.

For the above matter, air carriers and airport managing bodies have the direct responsibility concerning the training of their personnel, and indirect responsibility concerning employees of any sub-contractors hired for the purpose of providing assistance to disabled passengers and passengers with reduced mobility. In the latter case, air carriers and managing bodies are responsible for the quality of the provision of assistance given by the sub-contractor; therefore they shall systematize a method of control on the sub-contractor's performance, for instance by stipulating standards of quality for the provision of assistance upon signing the contract and/or, again for instance, also by assessing the services provided.

Purpose of this annex to Memorandum GEN 02 is that of providing guidelines to airport managing bodies, air carriers and any sub-contractors, on whose principals they shall establish their own training programs for their personnel who will be providing assistance to disabled passengers and passengers with reduced mobility.

1. Personnel that shall be trained

In general, all personnel having to interact with or assist passengers and in particular disabled passengers and passengers with reduced mobility need to be adequately trained.

Both the airport managing body and the air carrier can hire a sub-contractor in order to provide assistance; however, also in this case they will be both directly responsible for the adequate level of the service in reference to the different types of disabilities, and for making sure that the designated personnel is properly aware of specific needs related to each type of disability and thus behaves accordingly.

Training of the assisting personnel will become mandatory as from July 2008; therefore at that point all personnel providing assistance shall have received proper training. On the other hand, training of the entire organization may require more time than that remaining until that



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date, therefore in a first phase alternative solutions will be acceptable, as long as the minimum required by the Regulation is guaranteed, and that is that at least the part of personnel providing assistance is trained. For instance, the airport managing body could identify within its organization the sectors directly involved in provision of assistance and appoint some of their personnel for said assignment, completing their training by 26 July 2008; subsequently, it will have to implement a specific program to complete the training of the rest of the personnel.

The advice is in any case, that starting 26 July 2008 all new employees shall be trained on all disability matters and on provision of assistance for disabled passengers, in order to ensure that at one point in time the awareness of principles of equality and non-discrimination, at the foundation of the Regulation, will reach all sectors of the organization.

Concerning the initial education and the continuous training activities of the staff, the airport managing bodies, the air carriers and all other organizations that provide assistance and support for disabled passengers and passengers with reduced mobility, may look for the collaboration and/or participation of those social entities that deal specifically with, and have competence on disability matters. This opportunity can contribute to elevate the quality level of the provision of assistance, also through the adoption of methods of interaction and of comparison between and with the different types of disabilities.

The training shall take into account the particular needs that can arise from individual situations, age or specific moments in one's life. Data concerning particular events that occurred upon providing assistance and resulted in flaws in the established quality standards, and maybe even generated a complaint, shall be used to adjust and improve the training programs.

Each organization shall save the records of the training of its personnel and shall plan refresher training on a regular basis.

2. Training program for personnel interacting with the travelling public

The personnel considered in this paragraph are, for instance, that of the check in, or security personnel, or that of information desks and ticketing counters, or of businesses; hence all personnel that interact with the travelling public, which includes disabled passengers and passengers with reduced mobility. Ultimately, these are all employees who essentially communicate with passengers and provide information, with the exception of security personnel that perform also physical inspections.



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These personnel are not assigned to provide direct assistance, such as accompanying the disabled passenger, or move the passenger with reduced mobility from one wheelchair to another or from the wheelchair to the seat in the aircraft.

Personnel in this category may be part of the staff or the air carrier or of the airport managing body or of any sub-contractor.

The training program shall comprise, as a minimum, the following topics that shall be adjusted depending on whether they address cabin crew or ground crew:

- General knowledge of all applicable laws, Commission Regulations, ICAO, ECAC, IATA Documentation, specifically ECAC Doc. 30 with Annexes E, F, J, K and N; (L67/2006 of 1/03/2006 "Provisions for juridical safeguard of disabled persons victims of discrimination", Art. 14 European Convention on Human Rights, ICF, document emitted by OMS on 22 May 2001, UN Convention Safeguard of rights of disabled persons of 13/12/2006)
- Knowledge of the different types of disabilities, with special attention to the specific barriers each case faces and therefore to each one's different needs;
- Conduct and means of communication with disabled passengers and with passengers with reduced mobility with special attention to communication with passengers with sensory disability and passengers with learning disability;
- Knowledge of conduct required when dealing with a guide dog;
- Knowledge, in all circumstances, of conduct required and procedures to be followed in case of emergency at the airport or, for air carrier crew, on board the aircraft; in the latter case the emphasis is on the integration of the training program for air carrier crew with topics and practice referred to emergency procedures when disabled passengers and passengers with reduced mobility are on board (i.e. in case of rapid evacuation of the cabin, etc...);
- Knowledge, in all circumstances, of which conduct and measures shall be adopted in case of unexpected events, for instance a "non-scheduled stop", a change of flight, a missed connecting flight, etc...

How in-depth the above mentioned topics shall be treated and maybe also integrated with practice depends also on matters such as flight safety, as is the case for air carrier crew, or on



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matters requiring specific knowledge such as that referred to techniques of inspection, as is the case for security personnel. For the latter, Annex F of ECAC Doc. 30 provides useful indications on the topics and techniques that security personnel need to be aware of in case of inspection of disabled passengers or passengers with reduced mobility.

A particular category was also identified, pertinent only to the organization of the air carriers, that deals with the travelling public, although non directly but, rather, by bearing responsibility connected to air carriage of passengers, hence including the disabled and those with reduced mobility: this category refers to the flight crew (pilot, co-pilot). In accordance with Regulation EC1107/2006, it is recommended that this segment of air carrier personnel is trained on the legislative principles, for an adequate in-depth understanding of the rights of disabled passengers and of passengers with reduced mobility.

3. Training program for personnel in charge of providing direct assistance

This paragraph refers to the staff designated to provide direct assistance, namely personnel who accompany disabled passengers or passengers with reduced mobility, or help them move from one wheelchair to another or from a wheelchair to the seat on the aircraft, or assist disabled passengers or passengers with reduced mobility for all embarking/disembarking operations and for retrieval of luggage.

Mainly airport personnel belong to this category, but in some cases also cabin crew may be involved; in fact, if for instance once on board the passenger requires assistance to move to the toilet facility, or needs to be attended during any emergency procedures, he/she shall be given the expected assistance by the air carrier's cabin crew.

The training program for the segment of personnel that provides direct assistance will include the provisions listed in paragraph 2 of this annex, adequately integrated with the understanding, not only of the different types of disabilities, but also of the most appropriate means of assistance in each particular case, for instance:

- (a) assist a passenger who uses a wheelchair to move to another wheelchair;
- (b) assist a disabled passenger or a passenger with reduced mobility who travels with an assistance dog (in this case it is important to know the conduct to abide by with the assistance dog and what to expect from it);



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(c) assist a passenger with visual disability who travels with a guide dog (also in this case it is important to know the guide dog's behaviour and its role and this topic shall be addressed both with the ground crew and the cabin crew of the air carrier);

(d) know and be able to use the various types of tools and equipment being used for mobility disabilities and those used for sensory disabilities;

(e) know the many embarking/disembarking procedures by way of the different available devices that can be used for these operations, including any manual embarking/disembarking procedures (when they should be implemented, the related risks, etc...). Further in detail information on embarking/disembarking procedures and equipment is available in document Re. [2];

(f) psychological aspects such as a possible sense of vulnerability that some disabled passengers may experience, especially when travelling for the first time, because of their unavoidable dependence on the assistance;

(g) first aid.

The instruction program attended by personnel that provide direct assistance to disabled passengers and passengers with reduced mobility shall necessarily include practical training to effectively integrate the theory.

4. An example of training program

This paragraph intends to offer a non-prescriptive guide that illustrates which topics should be included in a basic training program for personnel that assist disabled passengers and passengers with reduced mobility travelling by air.

Given a common educational basis, obviously each organization needs to implement its own program in connection with its own purposes and keeping in mind specific requirements, such as those of personnel that deal with disabled persons and persons with reduced mobility, different from those of personnel that provide direct assistance; or in reference to ground crew as opposed to cabin crew, and bearing also in mind the logistic situation of the airport itself.

Another important principle to follow is that all programs, both for the theory and the practice, shall address all three main classes of disability: mobility, sensory, intellectual.

A course should therefore focus on:



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Part I (for all)

Legislative reference

Mobility disabilities and barriers

Sensory disabilities and barriers

Intellectual disabilities and barriers

Other disabilities (visible or invisible) that may reduce mobility

Conduct and communication:

 general aspects

 specific aspects

Classification in reference to assistance requirements

Normal procedures (these change based on the various duties of personnel attending the course):

 seat assignment

 briefing on board

 security inspection

 handling of situation in case of delays, flight changes, missed connecting flight, etc...

 procedures in case of denied assistance

 storage/embarking of mobility devices and in general of disability devices

Emergency procedures

 On board (as specified for the type of aircraft and by the Air Carrier)

 At the airport (specific for each airport)

Behaviour and function of the assistance dog and the guide dog

Part II (for personnel providing assistance)

Elements of anatomy of the back and of the muscular-skeletal apparatus, to understand the risks connected to manually moving a person with mobility disability

Psychological aspects:

- the normality of diversity: disabled, dwarfs, obese, cardiopaths, etc
- disability and/or needs: the autonomy
- be subjects, not objects
- the environment and the physical and psychological impact for the disabled person

Knowledge and use of mobility devices (difference between prosthesis, prosthesis/aid)

Knowledge and use of embarking/disembarking devices



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Knowledge and use of other devices

Escort a visually impaired passenger (at the airport or on board, i.e. to toilet facilities)

Escort a mobility impaired passenger (at the airport or on board, i.e. to toilet facilities)

Assist a disabled passenger or a passenger with reduced mobility in an emergency situation (on board)

First aid practices

Part III Practical training (logically in reference to the applicable part of the program, that is Part I or Part II)

5. List of Associations of disabled persons and persons with reduced mobility that contributed to elaborate this annex

1. Associazione Disabili Visivi
2. Assofly
3. Associazione Sipuò
4. CID.UE
5. CND
6. FAND
7. FISH
8. I.LI.TEC.
9. Lega Arcobaleno
10. Sunfly

6. Reference documentation

- [1] ECAC/CEAC Doc. 30 Part I, Section 5 and Annexes E, F, J, K, N
- [2] Health and Safety Executive UK - SIM 05/2007/07, Manual handling risks during assistance of disabled passengers boarding or disembarking aircraft