



December 20, 1991

## **THE FOLLOWING LETTER WAS SENT TO U.S. MAJOR AND NATIONAL CARRIERS**

This letter concerns recent communication problems involving disabled air travelers' reservation records. The issue is best represented by the widely reported incident of a wheelchair user who was severely inconvenienced because his condition was not properly entered in the reservation record and/or was not adequately communicated to each of the airlines on which he was scheduled to fly. One of those airlines was operating a small aircraft, which was unable to accommodate the disabled traveler.

Originally, it was alleged that the airline unlawfully refused transportation to a mobility-impaired person, which would violate Part 382 of the Department's regulations: Nondiscrimination on the Basis of Handicap in Air Travel. However, the aircraft had less than 30 seats. The DOT rule does not require carriers to hand-carry passengers on-board such aircraft when that would be the only means to board a mobility-impaired person. As a result, it appears that the denial of transportation did not constitute a violation of the rule. Nevertheless, a set of circumstances surrounded the reservations transaction which significantly increased the inconvenience to the person.

The travel agent who made the reservation in question informed us that at the time he created the passenger name record (PNR) in the CRS an entry was made indicating that the traveler used a wheelchair. The travel agent said that the entry was made in an OSI (other supplementary information) field. In addition, the travel agent asserts that separate follow-up telephone calls were made to each of the airlines involved in the itinerary, apprising them of the traveler's condition. The customer flew on three airlines and held confirmed reservations on one of those airlines' code-sharing partners.

In discussing the issue with the airlines involved, we learned that the only carrier with a record of the OSI entry was the airline on whose CRS the agent had made the booking. Typically, such OSI entries are not intended for use by anyone but the agent (or airline) creating the PNR. Airline officials advised that the industry has a "standard practice" provision which establishes a preferred method for conveying critical information to one or more on-line or interline recipients. Termed "SSR" (supplementary service request), it requires some form of acknowledgement and/or action by every recipient. There were no SSR entries in any of the PNRs in this case relating to disabled issues. Thus, it appears the information concerning the passenger's condition was not communicated; moreover, the code-sharing carrier, which operated the small aircraft, was placed in a tenuous position, because it did not have the opportunity to react to the errant PNR entry.

While as stated above the agent asserts that he personally notified the airlines by phone, our review of the reservations records provided to us by the three affected carriers does not reveal any evidence that calls were received regarding the traveler's disability. However, it is conceivable that the travel agent did make the phone calls, but all three carriers failed to make the appropriate notations.

It is important that everyone engaged in reservations functions - both airline and travel agency employees - be alert to the special needs of disabled air travelers. For example, reservationists should be aware that whenever a person is identified as mobility-impaired and a flight is a code-sharing operation, which by rule must be highlighted in the CRS with an asterisk, there is a great probability that the segment will be operated using an aircraft with fewer than 30 seats. The reservationist should immediately be alert to the likelihood that additional inquiry will be necessary to determine the extent of aircraft accessibility before confirming the reservation; the airline/agency employee would then be in a position to adequately inform the customer of the situation. Part 382 requires carriers to inform prospective disabled passengers about accessibility limitations of the aircraft expected to be used on a flight. Failure to do so could constitute a violation of this regulation.

As a percentage of all reservation transactions, the accessibility of aircraft for disabled air travelers, especially people using wheelchairs, may seem to be an issue that occurs infrequently. However, that fact, together with the major inconvenience to a disabled passenger that can occur, underscores the importance of diligent training efforts to ensure that whenever the occasion arises, the employee will always make the appropriate SSR entry in the CRS and conduct any necessary follow-ups. Likewise, travel agents should be trained to follow up to ensure that all needed communications and entries have been made, so that the traveler is made aware of potential accessibility problems.

Similarly, airline reservationists should be trained to key on even the most casual reference to disability issues. When a reservationist receives a call concerning a pre-existing reservation and reference is made to the customer's disability, it is imperative that the reservationist review the PNR to identify any potential conflict between the traveler's disability and aircraft accessibility, and to verify that the record is complete and accurate. It would be desirable to include a note in the record positively confirming the conversation.

We seek your cooperation and assistance to ensure that your company and its employees are fully aware of this sensitive problem and will take these and other steps that will help to reduce the likelihood of such occurrences. We encourage you to work with other airlines and the travel agent industry, either directly or through the various trade associations, to drive home this message. Through your voluntary efforts, any need for enforcement action can be avoided. You will be interested to know that this letter is being sent to each of the Major and National U.S. airlines. Later, through the cooperation and assistance of the Airlines Reporting Corporation, we intend to send generally the same message to more than 32,000 travel agents.

Thank you for your interest and support.

Sincerely,

Hoyte B. Decker, Jr.

Assistant Director for Consumer Affairs

Office of Intergovernmental and Consumer Affairs