

Docket ID: OST-2004-19482

Non-discrimination on the Basis of Disability in Air Travel

My comments relate to Subpart D Section 382.51 of the NPRM "Accessibility of Airport Facilities." The NPRM specifically requests input from individuals on the electronic ticketing kiosks found in airport terminals.

People who have problems with manual dexterity and tactile functions, will have difficulty using the electronic ticketing kiosks. It may be difficult for them to insert a credit card or frequent flyer card in the kiosk slot to activate the machine and/or to use the touch screen to respond to prompts.

With the aging of the population and the growth in the number of older air travelers, this problem will become more pronounced in the future. It may also act as a deterrent to air travel by older adults.

I don't have a specific solution to this problem other than for the manufacturers to examine possible options for modifying the slot on the kiosk in some way to make it easier to use. Obviously such options need to be cost effective.

The issue of the touch screens is a difficult one, especially for persons with arthritis. Questions that need to be addressed include : Is the text on the screen large enough and is it far enough apart to facilitate use by persons with manual dexterity problems? How easy is it to correct a mistake?

Problems in using the touch screen not only "tie up" the machine longer than necessary but also can create anxiety and stress among older adults. This is especially true if they they have a short time to board their flight.

The NPRM asks for input on whether 36 CFR § 1194.25 "Self contained, closed products" should be incorporated into the final rule by reference. It appears that this section does address a number of issues that confront people with certain disabilities. But I don't believe it directly addresses the issue of manual dexterity.

At this time I believe it is premature to incorporate this section into the final rule until more research is done to define the extent of the problem and to make sure that there is a cost-effective solution that corrects the problem. Such research could include, but not be limited to one or more of the following:

1. A survey of passengers using kiosks to identify the extent to which they may have trouble with the touch screen. The results of the survey would be cross-tabulated by age.
2. An estimate of the number of older adults who currently have manual dexterity problems or problems with tactile functions; and a projection of the number of older adults who may experience this problem in the future.
3. If not already undertaken, human factors research on the use of touch screens. Again the results would be cross-tabulated by age.
4. Consideration of alternative technologies to the touch screen.

While my comments relate specifically to the electronic ticketing kiosks located in airport terminals, they also apply to any vending machines that have touch screens and require manual dexterity in retrieving information or products.

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