

To Whom It May Concern:

I am writing regarding Proposed Rule change OST-2994-19482, which suggests a change to the rules regarding disabled passengers who travel with a large assistance dog. The DOT is proposing that the airlines may charge a disabled passenger flying with his or her assistance dog if the dog takes up more floor space than what is allocated to the paying disabled passenger. They are proposing that if the dog takes up more space, then they can charge for an extra ticket if the assistance dog intrudes into the neighboring passenger's space. If the disabled passenger does not want to purchase an additional ticket, then they will be given the option of waiting for another flight or shipping the dog in cargo.

I believe that the new rule, and the suggested options, are unacceptable and discriminatory. My 10 year old son, Daniel, has a rare genetic disorder called Fibrodysplasia Ossificans Progressiva\* that is turning his muscles to bone and making him increasingly stiff. In 2001, after 3 years of waiting, we received a service dog from Canine Companions for Independence. This dog, Copper, performs a number of functional services for Daniel, like picking up dropped items, retrieving things out of reach, and opening/closing doors. More than that, Copper has caused a metamorphosis in my son. He is no longer the kid everyone pities for all the typical things he can't do; he is now the envied kid who has dog handling skills and a dog like no one else. It has been a true miracle.

We travel by air quite often and Copper lays at our feet. The new proposed rule that would require the airlines to charge a seat for the larger dogs is unfair and discriminatory. First of all, no one has ever been upset by the presence of the dog. On the contrary, he is used to calm every crying kid on the plane. Second, as recommended by the International Association of Assistance Dog Partners, if someone is annoyed by the dog's tail or whatever, the attendants can always find someone who is happy to enjoy the dog's calming aura while flying. Their full suggestion is that, "You may offer the passenger sitting in a seat adjacent to the disabled passenger traveling with a large service animal a seat in the same class of service in another part of the cabin. If no seats are available in that class of service, you may ask for a volunteer willing to occupy the seat next to the disabled passenger requiring sharing of legroom. If no volunteer is forthcoming and seats are available in another class of service in another part of the cabin, you may ask the adjacent passenger or the disabled passenger to occupy a seat in that other class of service."

Copper and my son are a team. They must be together, out in public, in order to constantly reinforce the bond, the training, and the good things that Copper gives to Daniel, such as confidence, pride, self esteem, and more. People don't stare at Daniel anymore now that Copper is with him; that was the best gift of all. No service animal should be separated from its charge; it endangers not only the animal's health and welfare, but that of the disabled person. It is unlawfully discriminatory to ask only the disabled people to become more vulnerable as a prerequisite to flying.

If forced to choose between Daniel and Copper's welfare and flying, we would stop flying. That certainly wouldn't help the airline industry with its current financial problems. Instead of one extra ticket, they'd be losing three, and we are not alone. Most disabled people will not fly without their canines because they need the services the animals provide and because they won't risk these extremely valuable medical aides in the cargo bay. The average value of a service dog is over \$25,000, given breeding, feeding, vet care and training usually extending over 2 to 3 years.

Please adopt the language of the International Association of Assistance Dog Partners with regards to this issue.

Thank you.

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\*For more information on FOP, please go to <http://www.ifopa.org/>.