



September 25, 2018

The Honorable John Thune
Chairman
United States Senate Committee on
Commerce, Science, and Transportation
512 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Nelson
Ranking Member
United States Senate Committee on
Commerce, Science, and Transportation
512 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Shuster
Chairman
United States House Transportation and
Infrastructure Committee
2165 Rayburn House Office Building
Washington, DC 20515

The Honorable Peter DeFazio
Ranking Member
United States House Transportation and
Infrastructure Committee
2165 Rayburn House Office Building
Washington, DC 20515

Re: Section 437 of FAA Reauthorization Act of 2018

Dear Chairman Thune, Ranking Member Nelson, Chairman Shuster, and Ranking Member DeFazio:

The National Federation of the Blind and its special interest division, the National Association of Guide Dog Users, strongly oppose Section 437 of the FAA Reauthorization Act of 2018 (H.R. 302). The proposed measures detailed in this section infringe upon the civil rights of the blind by imposing unnecessary and burdensome restrictions upon those of us who use trained guide dogs, including people who train their own guide dogs. The purpose of this letter is to address some of our main concerns with the proposed language. We would welcome the opportunity to work with Congress to seek a solution that is satisfactory to all stakeholders.

One concern we have with the bill is requiring guide dog users to produce photographic identification of our guide dogs. This would only serve to enhance the sham cottage industry of fraudulent service animal certifications. Such restrictions would do nothing to curb those counterfeiters who attempt to take advantage of our civil rights in order to avoid legitimate fees charged by air carriers for the carriage of pets.

In addition, requiring guide dog users to obtain immunization records prior to traveling on an aircraft restricts the freedom of movement for the blind to travel for emergencies or simply take a spontaneous trip. This requirement is therefore discriminatory by creating a separate and unequal encumbrance on the blind not imposed upon our sighted peers.

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We urge that Section 437 is either eliminated in its entirety or amended to align with the Americans with Disabilities Act of 1990, which provides sufficient protections for entities by allowing for the exclusion of any animal exhibiting disruptive behavior. We further urge the implementation of legal sanctions for the fraudulent misrepresentation of an animal as a service animal rather than imposing undue burdens on those of us who use legitimate specifically trained service animals.

We appreciate your immediate attention to this matter and we are available to meet to discuss this further. I can be reached by phone at 410-659-9314, or by email at officeofthepresident@nfb.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Riccobono", with a long, sweeping flourish extending to the right.

Mark A. Riccobono, President
National Federation of the Blind

cc: United States Senate
United States House of Representatives