

Comment from D. Permar

Thank you for the opportunity to comment on proposed amendments to the Air Carrier Access Act (ACAA) regulation on the transportation of service animals

by air, Docket ID: DOT-OST-2018-0068

I am totally blind and have been partnered with five guide dogs over a period of thirty nine years. My guide dogs have been very well trained and exhibit excellent behavior both at home and in public facilities and on public transportation. Over the past few years travel on airlines has become more challenging to me and to my guide dog due to the unruly and at times aggressive behavior exhibited by emotional support animals which have not been trained to behave properly in public and have no other function other than comforting their owner. The list of instances where these animals have been disruptive and harmful to passengers and staff on airlines is much too long to describe here. In addition, there have been instances where a legitimate service dog has been bitten by an emotional support dog which has resulted in the service dog being so traumatized that it is no longer able to work. As a reminder, quite a bit of money and time are invested to train a service dog. In my opinion only service dogs should be permitted to travel on airlines. In light of all the present ambiguity and confusion, I support adoption of the DOJ's definition which defines a service animal as a dog that is individually trained to do work or perform tasks for the benefit of a person with a disability.

Emotional support animals are not service animals, as not having been trained, they are in reality emotional support pets and should be defined and treated as pets under the ACAA. Categorizing emotional support animals as pets will go a long way toward alleviating confusion and eliminating service animal fraud. Please consider taking the necessary steps to eliminate the practice of allowing emotional support animals on flights. Once such a policy is in place, passengers and airline staff can travel much more safely.