Sofia Koskinen Literature review: Passengers with Reduced Mobility and the main regulation differences between the EU and the USA



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# Tiivistelmä

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**Työn nimi:** Kirjallisuuskatsaus: Liikuntarajoitteiset ja vammaiset matkustajat sekä heitä koskevat lainsäädännölliset erot EU:n ja USA:n välillä.

Tutkintonimike: Restonomi (AMK), Aktiviteettimatkailu

Asiasanat: Liikuntarajoitteiset ja vammaiset matkustajat, lentoliikenne, lakisääteiset erot, PRM

Tämän opinnäytetyön tarkoituksena oli tehdä kattava ja hyödyllinen kirjallisuuskatsaus liikuntarajoitteisten ja vammaisten matkustaja koskevista lainsäädännöllisistä eroista EU:n sekä USA:n välillä, johon sisältyy kohderyhmän pääpiirteet, perustiedot sekä erityis- näkökulmana lainsäädännölliset erot käsiteltynä kahdesta eri näkökulmasta.

Tämän opinnäytetyön toimeksiantajana toimi suomalainen Finavia Oyj, joka on suomalainen lentoasemayhtiö. Yhtiöllä on pitkä historia Suomen lentoliikenteen toimijana ja se tunnettaan yhtenä arvostetuimmista toimijoista Euroopassa. Finavia mahdollistaa sujuvat ja monipuoliset lentoyhteydet maailmalle kattavan lentoasemaverkostonsa kautta.

Opinnäytetyön toteutustapa on kirjallisuuskatsaus ja se muodostuu kahdesta osiosta. Ensimmäisessä osiossa pääosassa on teoriakokonaisuuden kartoittaminen, kohderyhmään perehtyminen ja avustus palvelun kartoittaminen tutkielman kohdealueet huomioon ottaen. Toisessa osiossa pääosassa oli lakisäädökset vammaisten sekä liikuntarajoitteisten matkailijoiden oikeuksista ja niistä löytyvät eroavaisuudet. Kirjallisuuskatsauksen produktina, eli tuotoksena on tämä opinnäytetyö, joka toimii opastavana teoksena aihepiiristä kiinnostuvalle sekä alustavana selvityksenä lainsäädännöllisistä eroista toimeksiantajalle.



# Abstract

Author(s): Koskinen Sofia

**Title of the Publication:** Literature review: Passengers with Reduced Mobility and the regulation differences between the EU and the USA.

Degree Title: Bachelor of Tourism

Keywords: Aviation, Passengers with disabilities and restricted mobility, PRM, regulation differences

The purpose of this thesis was to create a comprehensive and useful literature review on the regulation differences regarding passengers with disabilities and restricted mobility between the EU and USA, which includes the main features of the target group, basic information on assisting service with a special point of view the main regulation differences from the two target areas.

This thesis was commissioned by the Finnish Airport Operator Finavia Oyj. The company has a long history as a Finnish Aviation company, and it is known as one of the best airport operators in Europe. Finavia ensures smooth travelling and versatile connections to the world through their comprehensive airport network.

This thesis was a literature review, a theory-based research, and it included two main sections. The first part comprised of the theory frame, defining the target group and assisting service considering the two target areas of the review. The second part comprised of the regulations regarding Passengers with Disabilities and Restricted Mobility and the main regulation differences. As a product of a literature review, this thesis will be a guiding publication to anyone interested in the topic and an introductory review on the regulation differences for the commissioner.

# Contents

1	Intro	roduction1		
2	Purpo	ose of the thesis and research questions	2	
3	Implementation of the Thesis		3	
	3.1	Systematic literature review	3	
	3.2	Material collection	5	
	3.3	Describing the material	8	
	3.4	Analyzing the material	8	
4	Finavia10			
	4.1	History of Finavia	11	
	4.2	Airport network	13	
	4.3	Organisation	14	
	4.4	Assignment	14	
5	Passengers with Reduced Mobility		16	
	5.1	PRM in Europe	16	
		5.1.1 Disabled Persons	17	
		5.1.2 International Traveler codes	19	
	5.2	PRM in the USA	20	
		5.2.1 Air Traveler with a Disability	21	
6	Assisting Service			
	6.1	Assisting Service in Europe	22	
		6.1.1 Financials for the assisting service of Finavia	23	
	6.2	Assisting Service in the USA	23	
		6.2.1 Financials for Assisting Service	24	
7	Research results		25	
	7.1	Conclusions	28	
8	Discu	ussion	30	
Attac	hment	ts		

# The Symbol List

- ACAA: Air Carrier Access Act
- **DOT**: Department of Transportation
- ECAC: European Civil Aviation Conference
- EU: The European Union
- FAA: Federal Aviation Authority
- IATA: International Air Transportation Association
- PRM: Passengers with Reduced Mobility
- U.S.: The United States of America

#### 1 Introduction

As the aviation industry grows every year, passenger amounts are also increasing which brings plenty of challenges. In 2018 the International Air Transport Association (IATA) published a press release, the 2036 forecast, which states that the volume of air travelers will be around 7.8 billion, in other words double the amount predicted in 2018(IATA, Press release No.:62, 2018). To keep air fares and passenger amounts growing while ensuring the safety of every passenger, there is much to consider.

This thesis is a literature review of the regulation differences between the European Union and United States of America, regarding PRM- travellers (Passengers with Reduced Mobility) in the aviation sector. In addition, the contents will cover the characteristics of PRMs for both target areas and assisting service. The principal of this review is the Finnish Airport Operator Finavia Oyj.

The main purpose and importance of this research is to gain more knowledge of the main differences and challenges in regulations between the European Union and the United States of America. The main goal of this thesis is to create a clear knowledge base about PRM and present the main regulation differences between the two target areas. With the help of this literature review, Finavia will have a clearer picture of the main challenges in the transitions to more frequent air traffic to the United States of America. Moreover, this research will also increase the author's knowledge of a minority amongst all passenger group types and will possibly help to promote a career in the aviation industry, as this is of great interest to her.

## 2 Purpose of the thesis and research questions

The purpose of this thesis is to research the basic information and regulations regarding PRM inside Europe and the United States of America, and to be able to question and understand certain issues amongst this passenger group. It will work as a guide for someone without any knowledge of PRM and as a review on the situation in 2019.

To assist with the review and research there are two research questions to delineate the research materials and to maintain certain goals for the review. These two consist of the following themes: the basic information and regulation differences.

The research questions for my thesis are:

- 1. Who are PRM travellers?
- 2. What are the biggest regulation differences between EU and USA?

### 3 Implementation of the Thesis

### 3.1 Systematic literature review

A systematic literature review is a scientific research method with the purpose of telling the reader why the new research is needed and important. It should also explain in which ways it complements previous research. It is a secondary research based on existing research that has been thoroughly selected and narrowed down (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 4). All systematic reviews need to be updated frequently to maintain their validity as sources of information.

Two of the most used and recommended guides to a successful systematic literature review are by the University of York and the Cochrane Compiled Database. York University has published a guide for 'undertaking systematic reviews of research on effectiveness' on their website. With these guidelines it is easy to follow the process of a successful systematic literature review with multiple different methods to choose from (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 5).

Literature review is an effective method for students to demonstrate their ability to learn about new topics and express information in their own words. The structure of a literature review is often divided into three phases to make it clearer, but it can also be in seven or nine parts. The three roughly divided phases in a literature review are: planning the review, executing the review with an analysis, searching and synthesis. The third phase is the actual report of the reviewed materials and results (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 5).

In the planning phase, previous research are under examination. After this the actual need for the review is easier to determine, because the previous research indicates if there is need for further research. If new research is conducted frequently, there is not much need for new research and a new topic must be chosen. If the previous research lacks validity it might be good to conduct valid research to support future reviewing. Finally, a research plan needs to be made. This plan should include preferably three clear research questions. If the systematic literature review cannot provide answers to the pre-determined research questions, one can interpret this as lack of research on a certain topic. It is also an important result even if it does not actually produce a systematic review. With the help of even a failed review, it can be easier to determine further research later (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 6).

After settling on the chosen research questions the next task is to choose a practical method to conduct the actual review. This step should include evaluating and researching different guides in order to produce a desired result. This consists of the search concepts and choosing suitable terms to achieve the most accurate and up-to-date results. Databases need to be researched and evaluated to avoid invalid and unofficial information sources (Johansson& others, 2007, 6). Databases such as Wikipedia, are not to be used in research as they can be edited and modified by anyone and might include biased information. Both manual research and online research should be included in the study to make the collected information as solid as possible. A wise researcher saves the chosen sources and materials for checking and re-evaluation in the future. Documenting the researching process needs to be finalized before moving onto the evaluation of collected information.

Evaluating the reliability of online sources is the responsibility of the person in charge of the review. The process takes time but can be minimized by using a strict method to research the materials and decide the main official sources in advance. Open access publications are becoming more popular which also helps revising a certain topic using official sources. Google is the most used of the free search engines. The basic method of Google is based on the automatic content reviewing a WWW page. Google Scholar is more scientific than the regular Google search because the information is more controlled, and the contents are described better (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 13). The use of University databases is also an effective way to reach official and accurate information since it only includes official releases of multiple books and online publications. These have been paid by the Universities and are available to its personnel and students. Reliable sources are regularly updated bibliographic reference databases, such as the university library or online journal collection. These are used through different search engines and links; the contents and structure differ considerably.

In the process of choosing a previous study to review, certain acceptance criteria, should be chosen. These can be related to the participants in the research, intervention, outcomes and design (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 6). In this case no previous research has been conducted of the principle, hence it was decided that the participants were used as the main criteria in the research process. This makes it more challenging to narrow down the research but also gives multiple opportunities on where to focus the research.

Systematic reviews are often done by researchers or for researchers to ensure the outcome is solid and balanced. The reviews done by one researcher are more often literature reviews done by using the methods of systematic reviews to obtain background information and as structural

guides. Solo reviews are often executed in co-operation with a work life related principal or researcher to achieve a competent review. Therefore, Finavia has been chosen to mandate this literature review (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 5).

#### 3.2 Material collection

There is plenty of material online and offline but before explaining the process of searching and analyzing the materials, it is necessary to sit down and think about your topic and area of research. There are many ways to express thoughts and build a plan, but the best option is a mind map. If the literature review has multiple research questions, the best way to search material for each question is to use different search words and terms for a certain topic. Choosing the correct research articles is secured by targeting pre assumed sources containing official information, such as the European Commission (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 58).

The acceptance and rejection of research articles in a literature review is often done based on whether the information in the articles meets the set criteria. This is examined based on the levels of title abstract and full text. In an English literature review the terms and words used to search for material should be checked from an official academic dictionary to guarantee that they are the official terms used in official releases. This way it is ensured that the materials make the review trustworthy and valid (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.) , 2007, 7, 59). The acceptance criteria for material used in this thesis are: they are official government releases or other official information which cannot be edited by anyone, they are related to PRM, the published release or research is in either English or Finnish and all of the above are as recently up-dated).

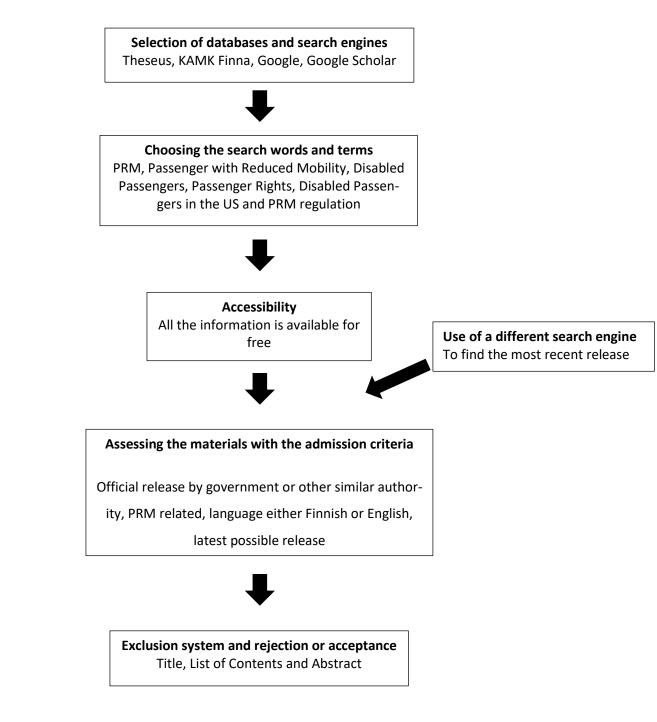
Sources of information are easier to choose if they are examined from the qualitative and quantitative point of view. The use of the information also needs to be defined in order to find the matching materials for the desired research method. There are multiple different ways to do this and the recommended options are: libraries, additional reading and bibliographies. The free services on the internet are always available and the scientific sources of information might be used for a fee. They are usually available for free in the libraries of educational institutions. These information sources demanding a fee to use them are more versatile and flexible than those available for free. For a thesis, the reliability of any source of information needs to be secured and it is recommended researchers use a professional advisor or a teacher to do so. The only way to become a professional in choosing informational sources is to practice. A good researcher returns to the sources from time to time to make sure there is new information available on the same topic. Additionally, the target group described in the research should be in focus when choosing information sources. In this case, since the topic is related to law regulations and aviation, the information sources are related to appropriate official releases which are about the target group PRM. This and the use of information define the fact whether the chosen information should be common knowledge or scientific literature (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 12, 15).

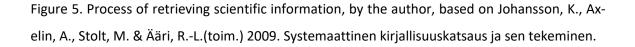
Regarding grammatical and stylistic accuracy, spelling, writing and hyphenated terms need to be checked carefully. The size of the letters used is not crucial and the special Scandinavian alphabets ( $\ddot{a}$ =a,  $\ddot{o}$ =o,  $\dot{a}$ =o, etc.) are not usually recognized in international databases. Terms that have a hyphen are to be written as separate terms and compound nouns. In international databases the search language is usually English and because of this the different language areas and terminology need to be checked (labor  $\rightarrow$  childbirth, etc.) (Johansson, K., Axelin, A., Stolt, M. & Ääri, R.-L.(toim.), 2007, 22).

For this thesis, the search for material was conducted in three phases. Firstly, information based on the title was sourced from the official service description from Finavia and the website of the International Air Transport Association, International Civil Aviation Organization and the European Commission. Then, the sources picked based on the title were examined further using the abstract and after this the information sources were read more thoroughly in the last phase.

The overall quality, content and the results and conclusions of the researches paid a significant role in the last phase. The legislative regulations were chosen based on the title and the paragraphs that were directed to the target group. Since the full regulations can be up to 250 pages long, it was more efficient to go through the list of contents and move straight to the key paragraphs. Guidance was received on which sources to use from the principal and my teacher supervisor. In the process of searching for material, the research method was not considered in the admission criteria to obtain as versatile results as possible.

To find material for the research on PRM in both the EU and the U.S. researching was done using the following search words: "PRM", "Passenger with Reduced Mobility in Aviation", "Disabled Passengers", "Passenger rights", "Disabled Passengers in the US" and "PRM regulation". In addition, multiple combinations and abbreviations of these previously mentioned search words were used during the material collection process. For example, Disabled Passengers AND their rights or PRM in the US/ Europe. Using these combinations and different search engines some similar research was found and more current information was found by using both for example Google Scholar and Avast Secure Browser.





### 3.3 Describing the material

The materials chosen for this thesis consist of official government publications and releases, service descriptions for service providers, news articles, scientific studies and official law regulation from the European Commission and U.S. Department of Transportation. The main sources are the International Air Transportation Association (IATA), Federal Aviation Administration (FAAV), International Civil Aviation Association (ICAO) and European Civil Aviation Conference (ECAO). The information on Finavia was collected from their original webpage www.finavia.fi. The literature used to describe the research method was collected from the Library of Kajaani University of Applied Sciences and online publications of the University of York, the University of Southern California and the Cochrane Collaboration.

The main regulation used as the core information for this review are: The Air Carrier Access Act (USA) 14 CFR Part 382 May 12, 2009 from the FAA and the European Civil Aviation Conference Regulation (EC) 1107/2006, paragraph 5.1.4.

## 3.4 Analyzing the material

A researcher is obliged to read a considerable amount of information. To help this process it is necessary to analyze the collected material thoroughly. To analyze, research and to draw conclusions from the collected material is the core of research. It is the most crucial phase, because it reflects the goal of starting the research. In this phase, the researcher investigates the solutions presented in the research. It is possible that due to the analysis, the researcher may discover how the problems should have been arranged in the first place (Hirsjärvi, Sirkka, 221, 2009).

It is not always clear when to start the analysis and how to do it. The norm is that analyzing is done after the material has been collected and arranged accordingly. This method best suits research where the material has been collected through structured forms or scale gauges. In a qualitative research the analysis is conducted throughout the process, as the material is being collected. When the final product is a Bachelor's thesis, the analysis period is not the same as for experienced researchers. Therefore, the process needs to be started while the subject is inspiring to the writer and clarifications can be made easily (Hirsjärvi, Sirkka, 223-224, 2009). In this case the analysis of the material was constant throughout the process. All articles, publications and regulations were analyzed while writing. This made it easier for the writer to keep up with what

they read and evaluate whether it is accurate and suitable information to be used in the review process.

#### 4 Finavia

Finavia is a Finnish airport operator that manages 21 of the domestic airports in Finland. 19 of these airports provide services for mainly passenger traffic and two serve as military and civil aviation airports. From all the airports that Finavia manages, especially the main airport at Helsinki-Vantaa has received many international awards and strong recognition. Airports in Lapland have played a major part in putting Finland on the world map as a tourist destination and enhancing tourism development all over Finland. In total, Finavia has 2700 employees at all the airports under their name (Finavia, Vision and strategy, 2019).

Finavia's mission is to ensure smooth and safe travel to its customers with the help of the national airport network. As a part of their vision they also want to enhance Finland's accessibility as an attractive and safe tourist destination. Finavia wants to ensure the best international connections for Finnish people. It takes responsibility to achieve this. Another aspect is profitable growth with exceptionally high-quality service as their strategic competitive advantage. Finavia's vision and strategy stand on the three pillars of responsibility, route development and developing customer experience, which make Finavia one of the most well-known airport management company in Europe (Finavia, Vision and strategy, 2019).

The Finavia head office is located at Helsinki Airport, which is the main airport hub from where numerous airlines operate international and domestic flights. It is one of the central and leading transfer airports in Europe, be-

cause of its ideal location and overall pleasing and positive image. It has the fastest and most direct route between Europe and Asia, which is one of the main reasons for its popularity. Overall Finavia offers ideal conditions for operating international flights through their national flight network with exceptional facilities and infrastructure. With the success of Helsinki Airport ensuring good connections from Finland to the world by increasing the number of domestic flights, they facilitate the profitable maintenance of the entire airport network. To encourage more investments in and to support the Finnish tourism sector, the key mission is to stay competitive, hence the main support is at the successful Helsinki airport, while the capacity and operations of the other airports in the Finavia network are ensured (Finavia, Vision and strategy, 2019).

Best flight connections in the Nordic area

Unique customer experience at the core of our competitive edge

Responsible and profitable growth as a basis for further expansion

Figure 2 Annual Report 2018

Passenger volumes at Finavia's airports from 2014-2018 increased impressively to a total amount of 25 million. This means a 10,1 % growth in total passenger volumes. About 14,6% of international traffic comes from Asia, 1,9% from North America and an impressive 69,5% from EU- countries. From Helsinki Airport the total amount of direct international destinations is 162 and there are 22 direct flights to Asia (Annual Report 2018, Finavia).

The volume of air traffic between Europe, Asia and USA is expected to grow quite considerably in the near future. (IATA, 2037 Forecast, 2018) The competition between airports will become

fiercer and everything needs to be developed to be able to keep up with such growth. When choosing their midpoint airport, every third transit passengers choose their connecting flight based on the midpoint airport (About Finavia, 2019). Due to the growth of smooth traffic, short transit times and attractive services will play an even more important role. The main aim of Finavia in this time of growth is to increase their market share.



Figure 3, Finavia's annual report, 2018.

#### 4.1 History of Finavia

Air Services have been significant for Finland for a hundred years. It has been possible to stay upto-date with developments all over the world, enhancing foreign trade and to make more international connections. Finland will continue to require functioning and versatile air services in the future because it is necessary to be a part of the global flight route network on top of the domestic one. Finavia has experienced multiple changes over the years to become the well acknowledged company with a positive image that it represents today (Finavia's History, 2019).

The company's history as an operator and owner of airports dates back to the year 1922. This was the year when air services became a part of the Ministry of Transport Equipment, later known as the Ministry of Transport. The company's responsibilities were to act as the aviation authority and to develop air services and airports (Finavia's History, 2019).

In 1972, after experiencing multiple developments and changes, the aviation department of the Ministry of Transport and Communications and the airport department of the National Board of Road and Water Construction were combined as the Civil Aviation Authority on the 1.3.1972. The newly merged organizations received 20 airports to manage and operate of which 16 had regular traffic. The Air Forces were permanently located at four of these airports (Finavia's History, 2019).

In 1991, due to international privatization, the funding of Finland's Civil Aviation Authority was separated from the government's budget. It also changed to a commercial enterprise in 1991. This meant new economic independence and possibilities to develop the business and services at airports. The actual regulatory role was created as an independent organization: Flight Safety Management (Finavia's History, 2019).

The name Finavia was used as the new name of the Civil Aviation Authority from 2006. Flight Safety Management was moved to an entirely separate bureau, this being the Federal Aviation Administration. The role of Finavia became stronger as it had infrastructure and 25 air navigation services under its name. In 2010, Finavia Oyj was founded when the business activities of the Civil Aviation Authority were moved to a government owned company. On 1<sup>st</sup> of April 2017 Flight Safety Management and air traffic control were separated to form a separate company, ANS Finland (Finavia's History, 2019).

### 4.2 Airport network



Figure 4, Finavia Airport Network in Finland, 2019

Enontekiö in 1988 (Airports, Finavia, 2019).

In 2000-2010 there were some changes in ownership and status of the airports. Kauhava airport was moved under the ownership of Kasvuyrittäjät Oy in 2015. In 2016, Lappeenranta was placed under the ownership of the city of Lappeenranta and Varkaus was categorized as a rogue aerodrome, an airport with no scheduled flights or other activity. Lastly, Malmi airport was transferred to the managership of the City of Helsinki. (Tietoa Finaviasta, 2019) The current network consists of 21 airports in operation, Helsinki being the biggest and most active of them all (Airports, Finavia, 2019).

Finavia's airport network in Finland consists of 21 airports. These are located from Lapland, Ivalo and Enontekiö, being the most northern points, to the most southern point, this being Helsinki-Vantaa on the mainland and Mariehamn in the archipelago. With this many airports Finland guarantees the best Nordic flight route network to the rest of the world (Airports, Finavia, 2019).

The history of the airport network starts from 1918 when the first airport at Utti was established. During the next 30 years the number of airports grew to 13 and in 1950 an airport opened in Joensuu and two years later Helsinki-Vantaa was opened for business. The last airport to start operating was

### 4.3 Organisation

Finavia is a public limited company and the sole owner is the state of Finland and the Prime Minister's office is responsible for ownership of Finavia. The Finavia Group has a parent company, the Finavia Corporation. It is managed by general meeting, a Board of Directors and CEO. The Board of Directors is responsible for governance and appropriate organization of the company's operations. Ensuring appropriately supervised accounting and financial management is also their duty. (About Finavia, Organisation, 2019) There are two committees, the Human Resource and Audit Committee. The CEO of Finavia is Kimmo Mäki, employed by Finavia since 2018, whose main work experience is from the Port of Helsinki, Steveco Ltd and Stockmann Inc. (CEO and Executive Board, 2019)

Finavia's funding is generated by its own operations with income from its business. Tax revenues are not used to subsidize Finavia's operations. (About Finavia, Organisation, 2019) Carriers and passengers are the main source of revenue. The success of Helsinki Airport is very important to the entire Finnish Airport Network and the revenue from commercial services at Helsinki Airport is used as financing for its operations and developing the network. The core businesses of the group are located at Helsinki Airport and the remaining airport network. A subsidiary is also included in the group's businesses that promotes the core businesses, Airpro Oy. (Financial Information, 2019)

#### 4.4 Assignment

The assignment for this thesis is to research the regulation differences in PRM in Europe and the United States of America, excluding Canada and South America. These target areas were chosen due to the increase in the number of flights and destinations by Finnair in the United States of America. (Finavia, Uutishuone, 12.4.2018) Since this output is a university level thesis by a Bachelor degree student, other geographical areas were excluded to ensure the completion of the thesis within the set time.

The need for the research arises from the growing number of passengers between these target areas and especially the rapidly growing amount of PRM. Brexit will also bring its own changes

when everything is settled. Consequently, this will impact the aviation sector in the UK with possible membership changes within the European Common Aviation Area, ECAA, or possibly new agreements (Briefing Paper, Brexit and Transport, 2018, 25-40).

The key part of the assignment is to build a solid base of what PRM comprises to someone who is not familiar with this type of passenger group. Then, the next step is to examine the current situation and what the possible changes might be.

#### 5 Passengers with Reduced Mobility

While the younger generation is job oriented, busy living their lives, the older generation is reachingthe age of retirement. According to a study, published in the Journal of Clinical Psychiatry, people in their 20s and 30s were reported to have the highest levels of depression, anxiety and stress. They also had the lowest level of happiness whereas older people were the happiest despite their physical and cognitive impairments (Oaklander, Time, 2016). The difference in activity amongst different age groups shows as significant growth in passenger amounts. As people get older, they may acquire restrictions due to diseases, disabilities or other factors of life that limit their mobility. Due to these factors, the need for assistance and assisting services becomes a crucial part of travelling.

A key term within this paper, PRM, is defined as "a person with a disability or physical restriction". Additionally, PRM service is defined as "the assistance service of the person with a disability or physical restriction." These two terms will be frequently used during this paper as abbreviations (Finavia Oyj, n.d., 3).

PRMs make up a growing and significant percentage of the world's population and they obtain the title of the world's largest minority. People with disabilities and PRMs have the same rights as all other citizens. These people are entitled to the freedom of movement, choice, and nondiscriminatory air travel as well as in other areas of life (Ref. Regulation (EC), introductory paragraph 1).

#### 5.1 PRM in Europe

The responsible authorities for PRM in Europe are the European Parliament and the European Commission. The main regulation regarding PRM in Europe is (EY) N:o 1107/2006, concerning the rights of disabled and passengers with restricted mobility while traveling by air. This regulation was implemented 26.7.2008 and has been in full effect ever since. According to this regulation, the authority responsible for providing assistance is the managing body of the airport, to which airlines, its representative or tour operator must convey information about passengers' need for assistance (Finavia Oyj, n.d., 4).

The European Civil Aviation Conference (ECAC) has fully Europe-wide recognized policies and codes of conduct regarding disabled passenger and PRMs. These can be found in Document 30 Part 1 in section 5 annex 5A-5L. In 2012, the European Commission released additional guide-lines for interpreting the classifications under the regulation. According to these regulations disabled passengers and PRMs have the same rights in mobility and freedom of choice as all other citizens (Finavia Oyj, n.d., 4).

PRM is a passenger whose mobility is restricted by a handicap or disability, thus meaning "a person with a disability or physical restriction" (Finavia Oyj, n.d., 5). The various types of restrictions a passenger may have can be either physical or mental or both. These restrictions can be temporary or permanent, motor or sensory. Hence, it can be for example autism, ADHD or any other disability that affects one's motor or sensory abilities (Hutton, Pharoah, 2002). All the previously mentioned disabilities reduce one's mobility and make it more difficult to function unaccompanied. Other factors that can limit one's mobility are conditions such as bad eyesight, trouble with hearing or joint problems and several other common issues caused by aging or other biological occurrences.

In order to provide persons with disabilities and PRMs with opportunities for air travel comparable to those of other citizens, assistance to meet the needs of each of these passengers should be provided at the airport as well as on board the aircraft. The necessary equipment and staff should also be provided (Finavia Oyj, n.d., 5). Discrimination towards PRMs and persons with disabilities should be prohibited and these persons should therefore always be accepted for carriage and not refused transport due to their disability and lack of mobility. As exceptions being the reasons justified on the grounds of safety and reasons prescribed by law (Ref. Regulation (EC), introductory paragraph 1).

## 5.1.1 Disabled Persons

Regarding disabled persons and persons with restricted mobility when travelling by air, the European commission according to regulation No 1107/ 2006 of the European Parliament and the Council firstly states that

"The single market for air services should benefit citizens in general. Consequently, disabled persons and persons with reduced mobility, whether caused by disability, age or any other factor, should have opportunities for air travel comparable to those of other citizens. Disabled persons and persons with reduced mobility have the same right as all other citizens to free movement, freedom of choice and non-discrimination. This applies to air travel as to other areas of life." (Regulation No 1107/2006, the European Parliament and Council, 2006).

This implies that each traveller should be treated as equal without exception. To achieve an ideal situation where all travellers are treated as equals demands multiple procedures from the responsible authorities on departure and arrival (Hutton, Pharoah, & Rosenbloom, 2002). Many regulations have been set to protect the rights of each traveller and one that has rarely experienced any changes is the non-discrimination regulation. Basic human rights are respected and supervised, however in the U.S. there have been some cases where a passenger has been removed from a flight due to racism related suspicions (BBC, United Airlines, 2017).

Unfortunately, disabled persons tend to face more challenges and conflicts when compared to others. The United Nations and Convention on the Rights of Persons with Disabilities (CDRP) has agreed on what countries must do in order to make sure that disabled people have the same rights as others. They are to be respected for who they are, and everyone should have equal rights. However, not everyone is aware of this situation. The convention clarifies and qualifies how all "categories of rights apply to persons with disabilities and identifies areas where adaptions must be made for person with disabilities to effectively exercise their rights." It also states in which areas their rights have been violated and where there is need for reinforcement. (United Nations Convention on the Rights of Persons with Disabilities, 2006)

to the need to develop accessibility to public buildings, transportation and schools as well as information is still needed. Therefore, the United Nations supervises countries and makes sure that all laws and regulation as well as policies are created with equality. Disabled people must be acknowledged as equals in every policy. Activities such as travelling is a common human right but is not always equal in accessibility, thus for this reason the acknowledgment of PRM is important. (United Nations Convention on the Rights of Persons with Disabilities, 2006)

#### 5.1.2 International Traveler codes

To separate and individualize PRM passengers more precisely, there are 8 different international traveller IDs made by the International Air Transport Association, IATA.The organization has created four capital letters to define certain disability within an ID card. These all provide information to the authorities taking care of the assisting of PRM to make the service operate smoothly and safely for the passenger. These codes have been established to make sure passengers with such restrictions or disabilities receive the appropriate treatment and assistance during their travel. (Finavia Oyj n.d., 3).

The most common traveller IDs are WCHR, WCHS, WCHC and DPNA. Firstly, WCHR which represents someone, who can go up and down the stairs and is free to move around in the airplane without assistance. However, outside the airplane they need a wheelchair or another assistance to move between the terminal and the plane, in the terminal itself between departure and arrival points (Finavia Oyj n.d., 3).

Secondly, WCHS stands for a passenger who is not able to walk up and down the stairs but is able to move around in the airplane and needs a wheelchair or other assistance to move around and between the terminal and airplane, additionally between departure and arrival points, and the journey to the gates through security (Finavia Oyj n.d., 3).

WCHC is a person who is completely unable to move around in the airplane or stairs alone and needs assistance throughout the whole process of boarding the plane and moving around the terminal from the moment they arrive to the airport. They might also need special seat equipment where the special needs of the passenger have been taken into account. It also needs to be assured that the assisting process at the destination works as smoothly as it did in the start of the journey, but of course in reversed order (Finavia Oyj n.d., 3).

The letters DPNA describe a passenger whose development or mental activity is disturbed or obstructed. For example, autism might be one factor to make a person DPNA need assistance. BLND and DEAF describe a person with visual impairment (BLND) or hearing impairment (DEAF) (Finavia Oyj n.d., 3).

All the above are official abbreviations used internationally to avoid any misunderstanding while servicing PRM persons.

MAAS includes Unaccompanied Minors, UM, and their assisting and mobility have special measures to consider. A minor is a child under the age of sixteen. According to IATA: Unaccompanied Minor is a child of the age less than sixteen travelling alone or traveling in the company of another child less than sixteen years old. IATA/ Control Authorities Working Group has guidelines for recommended best practice for minors. These guidelines include information for control authorities and airlines on how to handle UM. The requirements for UM while traveling differs between destinations, hence these should be checked prior to departure by parent or the guardian of the UM. There is a special travel document for these passengers and airlines usually have their own UM Handling Advice form to guarantee the safety of the minor during their travel (IATA/Control Authorities working group, Best Practice for Minors, 2007, 3-6). This group however does not belong under the regulation on PRM, as it has been often misused by airlines in order to seek for example interpretation assistance to a passenger without an impairment. (Jari Pusa, 12.9.2019)

## 5.2 PRM in USA

As in Europe, the law regulation regarding PRM is (EY) N:o 1107/2006, the equivalent for regulations regarding air travelers with disabilities in USA, is the Air Carrier access Act (ACAA) 14 CFR Part 382. This publication is a detailed set of rules to define the air carrier's responsibilities under the ACAA and to ensure discrimination free treatment to all travelers with disabilities. This was published in 2003 and is updated regularly when needed (ACAA, 14 CFR Part 328, 15).

The responsible authority in the United States of America is the Federal Aviation Administration (FAA), an operating administration of the department. The responsible department for the regulation 14 CFR Part 382, the Nondiscrimination on the Basis of Disability in Air Travel, is the U.S. Department of Transportation (DOT or Department) (ACAA, 14 CFR Part 382, 3).

PRM as a term is not in use in the USA as common as it is in Europe. In the USA, when referring to PRMs in air travel, the regulations and publications use the term 'air traveler with a disability or individual with a disability'. The ACAA prohibits U.S. and foreign air carriers from discriminating against an air traveler with a disability (ACAA, 14 CFR Part 382.15).

In paragraph 31 of the regulation 14 CFR 328 Part 1 section (a): the refusal of transportation states that a carrier shall not refuse to provide transportation to a qualified individual with a disability based on their disability. The paragraph includes a part where it is stated in section (b) that the refusal shall not be done based solely because the person's disability results in appearance

or involuntary behavior that may offend, annoy or inconvenience crew members or other passengers (ACAA, 14 CFR Part 328.31).

### 5.2.1 Air Traveler with a Disability

According to the ACAA regulation 14 CFR Part 382.5 an individual with a disability is any individual who has a physical or mental impairment that, on a permanent or temporary basis substantially limits one or more major life activities. Such an individual also has a record of such an impairment or is regarded as having such an impairment (ACAA, Sec. 328.5).

Physical or mental impairment as used in this definition according to 14 CFR Part 328.5, paragraph 1, means: any psychological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory including speech organs, cardio-vascular, reproductive, digestive, genito-urinary, hemic and lymphatic, skin or endocrine. According to this paragraph referring to any mental or psychological disorder such as mental retardation, organic brain and specific learning disabilities (ACAA, Sec. 328.5, paragraphs 1&2).

Another definition that requires explanation is 'a qualified individual with a disability' who: accompanies or meets a traveler using airport facilities, seeks information about schedules, fares and policies. Also, a person attempting to use facilities or services offered to the general public by an air carrier, has a ticket, or makes a good faith attempt to buy a valid ticket for a flight, arrives with a valid ticket for the flight; and meets reasonable, nondiscriminatory requirements applicable to all passengers (ACAA, Sec. 328.5).

#### 6 Assisting Service

The main goal of assisting service is to ensure the disabled or the persons with restricted mobility the same possibilities for air travelling as all other citizens. The airports, airlines and other operators form a seamless service chain. With this service chain the smooth, safe and pleasant journey of the passenger from the starting point to the end is ensured. PRMs and Air travelers should be equal to other citizens without any special restrictions on the freedom of choice or movement as they have the same level of humanity.

## 6.1 Assisting Service in Europe

The reason why Finavia is the principal for this thesis is the assisting service for PRM that they offer at all the airports they manage in Finland. Finavia will be used as an example of the European way to provide the assisting service to PRM. There are guidelines given on the rights of the disabled and the persons with reduced mobility in the regulation (EY) N:o 1107/2006 of the European Parliament and Council, which has been in full effect since 26.7.2008. According to this regulation the responsibility for the passenger's help is either the airport's, the airline's or its representative's or the tour operators to provide the report of the needs of the passenger. Finavia recognizes fully, the policies and codes of conduct used all over Europe, on assisting the disabled or the persons with restricted mobility. These are defined in the document from ECAC in Doc 30 I part 5 and attachments J, K, N. The EU Commission in 2010 has released additional guidelines for interpreting this regulation, which has more defined specifications on the classifications covered by the regulation (Finavia Oyj, n.d., 4).

All people with a disability or restricted mobility have the same right to the freedom of movement and freedom of choice as all other citizens. The PRM service is offered so that everyone should have the same level of equal and effortless travel. The service includes assisting the arriving PRM traveler from the certain point of arrival to the seat in the aircraft and all the way to the defined exit point from the seat. It covers the assistance of a solo passenger travelling with an infant child. (Finavia Oyj, n.d., 4).

Additionally, the airport managing bodies and air carries should work in partnership to guarantee, review and develop the way that this special assistance is organised in appropriate manner for professional and seamless service. The Disability- equality and disability- awareness is a crucial

part of the training of the airline and airport personnel, in order to ensure that the assistance is what the persons with disabilities may need and that every individual is treated with respect (ECAC, Reg (EC) 1107/2006, paragraph 5.1.6).

#### 6.1.1 Financials for the assisting service

To give an example of the financials of the assisting service in the European Union under their regulations, Finavia will be used as an example to provide numerical information.

Finavia's financial policy with the assisting service and its customers is the following. Finavia collects a PRM payment of  $0,28 \in$  per each departing passenger from the airport. Compared to the average PRM fee of other European Airports of  $0,56 \in$ , Finavia has a very low fee. This payment is collected from the airline. With the collected money all the expenses and purchases, needed to execute the assisting service, are funded (Jari Pusa, email 15.4.2019).

The biggest expenditures within the assisting service are arranging the assisting resources and acquiring the equipment and tools needed to complete the assisting of PRM. Training the PRM personnel is also paid with the collected PRM payment (Jari Pusa, email 15.4.2019).

What comes to the financials according to the European Civil Aviation Conference Regulation (EC) 1107/2006, in paragraph 5.1.4 it says that "In the interest of social inclusion, the persons concerned should receive this assistance without additional charge." Meaning that the assisting service should be provided without additional payments from the customer. According to the same regulation in paragraph 8, the assistance is to be financed in a way to spread the burden equitably among all passengers and to avoid disincentives to the carriage of disabled persons and PRMs. This is done on a non-discriminatory basis (EC, 1107/2006, paragraph 8).

### 6.2 Assisting Service in the USA

The assisting service in the United States of America according to the ACAA regulation 14 CFR Part 328.5 is the responsibility of each carrier operating at the airports. As stated in paragraph §328.39: Carriers shall aid requested by or on behalf of qualified individuals with a disability or offered by air carrier personnel and accepted by qualified individuals with a disability, in enplaning and deplaning, put on board and disembarking an aicraft. It is also stated that the delivering carriers shall be responsible for making flight connections and transportation between gates. This assistance shall include the service personnel and the use of ground wheelchairs, boarding wheelchairs, on-board wheelchairs and ramps or other mechanical lifts. In no case, should carriers hand-carry a passenger in order to provide boarding. This is only permitted for emergency evacuations (ACAA, 14 CFR Part 1 328.39).

The personnel of each aircraft with more than 19 passenger seats, shall receive training provided by the carriers. It shall meet the requirements of the paragraph §328.61. The requirements inlude details such as consultation with such organizations representing persons with disabilities, proper and safe operation of equipment and to acknowledge other regulations from DOT or FAA affecting the provision of air travel to persons with a disability (ACAA, 14 CFR Part 328.61).

Within the aircraft cabin the services carriers shall be provided as requested by or on behalf of the individuals with a disability. In the case the service is offered by the air carrier personnel and accepted by individuals with a disability special guideline is set for that in §328.39, paragrapgh 3 b. There are also special regulations depending on the aircraft size in section §328.40 (ACAA, 14 CFR Part 1 328.39-40).

#### 6.2.1 Financials for Assisting Service

The financial policies for the Assisting Service in the United States of America, according to the regulation §382.31, are:

Carriers must not impose charges for providing facilities, equipment, or services that this rule requires to be provided to passengers with a disability. Charging may be done for services that this part does not require. However, for the use of more than one seat, if the passenger's size or condition causes them to occupy the space of more than one seat, then as passenger may be charged (ACAA, CFR 14 Part 382.31). This means that the customer/passengers will not pay extra fees for the assisting service unless they need to use more than one seat on board due to the conditions mentioned in regulation §382.31.

## 7 Research results

As a resultof conducting researchregarding the main regulations of both target areas, Europe: (EC) No 1107/2006 of the European Parliament and of the Council of 5 July 2006 and the United States of America: U.S. Department of Transportation 14 CFR Part 328, the following main differences were found. Every article and paragraph will not be examined here, however everything was reviewed and the most intriguing differences are explained in this chapter.

Firstly, the main difference between these regulations is regarding the responsible authority to arrange the assisting service. In the case of Europe, in paragraph 6 the responsible authority should be the airports. As managing bodies at airports play a significant role in providing multiple services throughout their airports, they should be given this overall responsibility. Managing bodies may provide the assistance to disabled passengers and PRMs or alternatively they may contract with third parties (EC, No: 1107/2006, paragraph 6). In the U.S. this responsibility is the opposite from the European regulation. In the U.S., the responsibility to provide this service is the air carriers. However, they also may use contractors to supply for this service. In addition, both must guarantee the equal rights with other citizens to travel for passengers with disabilities or restricted mobility at the airport as well as on board aircraft and assure discrimination free travel (DOT, 14 CFR Part 382, 2003, paragraph 9).

Another difference between these two regulations is the right to inquire information in advance about nature of the passenger's disability or restriction. According to the European regulation asking about the nature of the restriction or disability is allowed in order to provide specific assistance to the passenger (EC, No: 1107/2006, paragraph 5.2). In the case of the US regulation asking for foreknowledge is not allowed as the service is to be offered to anyone with a restriction or disability without specific details on their restriction (DOT, 14 CFR Part 382, 2003, paragraph 7).

Financially the main differences found from these two regulations are the following. According to article 8 paragraph 1, the managing body of an airport shall be responsible for ensuring provision of the assistance without additional charge to disabled persons and PRMs (EC, No: 1107/2006, paragraph 1). However, they can provide special higher quality services for additional charge (Finavia Oyj, n.d., 15). In the U.S. the assisting service shall be provided without additional charges, except additional charges may occur due to the need of an extra seat. The extra seat

may be needed if the size of the passenger or condition (e.g., use of a stretcher) causes them to occupy more than one seat (DOT, 14 CFR Part 382, 2003, paragraph 31).

The difference in extraterritoriality between the USA and EU is that according to the US Air Carrier Act 14 CFR Part 382 is that on all U.S. airports DOT exercises authority over all flights and all ticketed passengers. Non- U.S. airports have no direct authority and in their case the DOT exercises authority indirectly through the airlines. (DOT, 14 CFR Part 382, 2003) This means that the U.S. laws are to be followed by the whole world as the DOT has more authority and the EU regulation has a more limited authority. The ACAA applies to all US carriers, foreign carriers flying into and out of the USA and to all code share flights with US carriers anywhere in the world (PRM assistance managers training, 20-24.5.2019, PassePartout Training Ltd.). Whereas the European regulation, (EC) No: 1107/2006, paragraph 13, states that the provisions should apply to passengers using or intending to use commercial passenger air services on departure from, in transit through at an airport or on arrival at an airport which is situated in the territory of an EU member state (EC, No: 1107/2006, paragraph 5.2).

Access to information is crucial for any passenger, especially to passengers with a disability or restricted mobility. According to the European regulation (EC) No: 1107/2006, paragraph 13, the available information should be provided in alternative formats accessible to the disabled. These should be provided at least in the same language as the information available for other passengers, on board and at the airport (EC, No: 1107/2006, paragraph 13). In the U.S. regarding access to information, it is stated in paragraph 45, that each carrier shall ensure that qualified individuals with disabilities, including those with vision or hearing impairments, have timely access to information the carrier provides to other passenger at the airport and on-board aircraft. Carriers shall also provide information on aircraft changes that will affect the travel of persons with a disability (DOT, 14 CFR Part 382, 2003, paragraph 45).

The possible cases where there is the need to compensate lost, damaged or broken equipment are stated differently by both target areas. According to the European regulation the compensation of equipment for the passenger whom it belongs to should be in accordance with the rules of international, community and national law (EC, No: 1107/2006, article 12). In the U.S. the compensation and criteria for calculating the amount of damaged, destroyed or lost devices shall be the original purchase price (DOT, 14 CFR Part 382, 2003, paragraph 43.b). Therefore, there might be some misunderstandings in the criterion between these two target areas, although there are multiple reasons to have different methods for compensations.

When discussed about service animals, that in some cases are essential for PRMs, the main differences between the US and European regulations is very noticeable. According to the EU regulation the service animal must be a professionally trained and licensed service dog in order to allow it to accompany the PRM on board (Doc 30, Part 1- 12<sup>th</sup> Edition, May 2018). As a foreign carrier you are not required to carry any other service animals as service dogs (DOT, 14 CFR Part 382.7(c)). According to the US regulation, a service animal is an animal individually trained to perform functions to assist a person with a disability; animal that has been shown to have the innate ability to assist a person with a disability or an emotional support animal or psychiatric service animal. The exceptions on service animals are that rodents, reptiles and spiders are not allowed as service animals due to the safety requirements (DOT, 14 CFR Part 382, 2003, paragraph 55).

Lastly the complaint procedures when the passenger with a disability or restricted mobility experiences that they have not been treated accordingly. The European regulation guides the passenger to make a complaint to the airport managing body, which will handle the situations according to the regulation (EC, No: 1107/2006, article 15). A complaint can be also done to the airline, which will handle it according to the regulation. For example, in the case of Finland, a complaint can be done to the airport managing body, airline or lastly to the Finnish Transport and Communications Agency, Traficom. If the airport managing body or the airline cannot find a way to compensate the passenger Traficom will take responsibility to process the complaint (Jari Pusa, 12.9.2019) Whereas, in the U.S. the regulation states that each carrier must have one or more Complain Resolution Officials, CRO, who shall be available at each airport the carrier operates. The carrier may also make the CRO available via phone, at no cost to the customer, if the CRO is not present in person at the time of complaint (DOT, 14 CFR Part 382, 2003, paragraph 151, subpart K).

Even though there are plenty of legislative guidance and regulations on the rights of Passengers with Disabilities or Reduced Mobility, the truth can be rather upsetting in many cases. Many passengers still face undignified treatment and discrimination despite the legislative guides and regulations. Some areas of the world do not have any kind of laws specifically relating to aviation and passengers with disabilities, which brings plenty of confusion, misunderstanding and mistreating to these passengers. For example, Latin America is one region without such laws. The lack of a unified global set of standards is one solution that would solve many problems with the mistreatment and would be beneficial to all passengers with disabilities or restricted mobility (Passenger experience, IATA, 2012).

Another point of discomfort and conflicts to the travel are security searches. During the security searches often, the problem is the lack of training and empathy when handling a passenger with a disability or restricted mobility. The staff should be accordingly trained to treat these passengers equally and comfortably instead of for example, emphasizing the prosthetic limb. Security searches should be carried out with sensitivity and respect towards passengers with disabilities, while following the official procedures (Accessible Air Transport, n.d., 2). Damaged or lost equipment cases could possibly be minimized by training the baggage handling staff accordingly and many cases such as this could be avoided with extra effort in training (Accessible Air Transport, n.d., 6). Special training, such as e-learning, would expand the overall PRM knowledge in different areas and help the staff to understand PRM and their needs better. The overall process of ensuring the same accessibility option for all passengers takes plenty of investments, attention and time, but in full effect would smooth out the travelling equally for everyone (Accessibility, International Airport Review, 2018).

On top of these differences and conflicts the process of achieving a smooth and equal global set of standards for PRM will continue to be developed in the future. Economic pressure, lack of consistency and confusion amongst passengers are some of the many difficulties. Clearer and more comprehensive information about every step of the journey could help many of the passengers to assess their need for assistance in advance and would also help the airlines, to achieve the future of global and equal assisting service and treatment for Passengers with Restricted Mobility or Disabilities (Accessible Air Transport, n.d., 4-6).

## 7.1 Conclusions

The process of reviewing the regulation differences began with researching the PRM as a target group and assisting service. It was crucial to familiarize myself with the terminology and definitions of both main topics. Internalizing PRM was the most important task before starting to review the regulations. In practice this meant a large amount of material to read and note-taking to understand the topic thoroughly. With help from the principal I was able to select the correct regulations to be examined and was able to plan the theoretical contents logically.

To conclude, among the main differences chosen to be previewed there are not any major conflicts between the two regulations, Europe: (EC) No 1107/2006 of the European Parliament and of the Council of 5 July 2006 and the United States of America: U.S. Department of Transportation 14 CFR Part 328. These thoroughly state the rights of passengers with disabilities or restricted mobility, with non-discrimination and equal rights with other citizens. Both parties have multiple similarities with airport design requirements, definitions of passengers with disabilities or restricted mobility and other key factors in creating a functional regulations and guidelines. The European regulation has more emphasis on the role of the member states of the European Union, whereas the U.S. emphasizes the role of foreign carriers and the differences between their parts of the regulations. Amongst European managing bodies for assisting services there is more emphasis on quality standards and guidelines ensuring a high standard service in comparison to the U.S. guidelines. These are minor differences in addition to the main ones discussed previously. Neither one of the two parties as the subjects of this review treat the passengers with disrespect or with unequal rights and both guarantee everyone with a disability or restricted mobility safe travel.

#### 8 Discussion

The goal of my thesis as a literature review was to research PRM and divide the theory part of each section in to two and review it from a European and U.S. perspective. The whole process started in October 2018 with creating a proposal for the thesis and making a commissioning agreement with Finavia. During the proposal period the author was working on other school projects and assignments, which made focusing on the research difficult.

The process was conducted in two parts. The first part was the process of creatingthe the proposal and collecting the materials on PRM and the assisting service in both Europe and the United States of America. To define the topic and narrow down the scale of the review took effort and time as aviation is a large topic and PRM was an unfamiliar topic for the author The duration of this part was from October 2018 until the end of February 2019 and the actual written part of the proposal was implemeted in January and February 2019. The second part's duration was from the end of February 2019 until May 2019.

The most challenging part in the whole process was finding the appropriate research method and materials. As a literature review is not a common research method for a thesis amongst the two main methods, qualitative and quantitative, it was rather difficult to start the process and understand the different approach. The main source of information was the service description of PRM from Finavia and the two main regulations. Material for PRM in Europe and the research method was easy to find from multiple qualifying sources, but the materials regarding passengers with disabilities in the United States of America was rather difficult to find at first. Therefore, I contacted the principal and was able to find plenty of material with the help I received from them. Another challenging factor was the English language I chose to use instead of my mother tongue Finnish.

I had a very detailed schedule for the actual thesis. It had daily tasks on when to write theory and when to research for more material. This changed considerably due to other schoolwork and other life situation changes. Therefore, I made a new schedule which was done based on the topics and a goal of when to finish each topic. This helped to stay on schedule despite the changes and workload from school. As soon as the contact lessons ended the focus was completely on the thesis. At first the topic seemed very interesting and at the same time intimidating. As the thesis moved forward, I started to get more interested in the topic as my own knowledge of the topic grew. I got more inspired during the process and managed to find an internship position related to the topic. In my opinion the skills I have in the tourism industry were strengthened due to this challenging yet rewarding process. The field of aviation and especially the PRM side of the industry created a new point of view for myself in how I see the industry.

Literature review as a research method suited me as a more theoretical than practical person who enjoys experimenting with new research methods. Researching law regulations and research was comfortable and interesting. The most useful lesson from this was that the vocabulary in the regulations and aviation materials were significantly different compared to the experience gained through my education at university level.

The purpose of my thesis was to set out the basic information on PRM and what the legislative differences between Europe and the United States of America were, to help individuals with very little information on the topic to understand it better. The main idea was to gather the basic definitions and key terms combined with an interesting perspective to compare the different target areas. As a concrete output, this thesis shall remain as a guide on PRM with the additional review of the main regulation differences between the two target areas. Finavia and individuals interested in the research method or PRM as a topic can use this thesis as a guiding review and can be researched more in the future.

In my opinion I succeeded in producing a solid review according to the assignment and was able to learn considerably about a new topic which will help my career planning and hopefully inspire others to learn about PRM.

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