

Janice S. Lintz

Redacted

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ICC

Attn: Kimberly Paarlberg, email redacted

Action Requested: For the ICC to (1) discontinue the use of the current universal symbol for access, since it doesn't indicate what forms of disability access are provided, and (2) to use the symbols below to indicate the form(s) of hearing access that are provided:



Assistive listening symbol



Hearing loop symbol



Open captions symbol



Closed captions symbol



Sign language interpreting symbol

Statement of Grounds:

The current ADA symbol of a wheelchair just represents people who use a wheelchair and omits other physical disabilities, hearing loss, vision impairments, and cognitive disabilities.

Further, the ear symbol with a slash does not indicate what form(s) of hearing access are available.

Discussion:

The current ADA accessibility symbol is not representative of the spectrum of people with disabilities. Just like the LGBTQI community uses a letter for each of the various members, it is time for the disability community to be more inclusive. The ICC needs to either develop a symbol representing the full disability community or display individual symbols that indicate each specific form of access provided. Symbols for hearing access are shown above.

The ear symbol with a slash fails to indicate what hearing access is provided and is offensive to some. The Canadian Association of the Deaf (Ex A) "rejected the use of the slashed-ear universal symbol of access in 1990. We brought our position to the attention of the World Federation of the Deaf, which had approved of the symbol, and persuaded the WFD to withdraw its support of it":

The slashed-ear symbol was rejected for many reasons:

It fails to distinguish between the very different access needs of people who are Deaf and people who are hard of hearing; thus, the symbol could be used to indicate that assistive listening devices are provided, but not Sign language interpretation. Therefore it fails to function as a true symbol of access for EITHER Deaf OR hard of hearing people, let alone BOTH at the same time.

It fails to indicate what access is being provided: interpretation? employees who Sign? TTYs? flashing alarms?

The slash across the ear implies that hearing loss is a defect or a negative, i.e. "can't hear". Symbols for other disabilities focus on the positive: people with mobility disabilities "can use wheelchairs", blind people "can use canes".

The slashed-ear symbol leads to misunderstandings: Deaf children have been known to assume it means "No Deaf people allowed".

The slashed-ear symbol is unattractive.

The Canadian Association of the Deaf approves of symbols that indicate specific access services in a positive way, such as the TTY symbol (keyboard with phone handset) and the interpreter symbol (hands making the "interpret" Sign).

At the present time, there is no one acceptable universal access symbol for either deafness alone or for deaf and hard of hearing people together. The Canadian Association of the Deaf questions the need for such a single symbol when the means of providing access to Deaf and hard of hearing people are so various. Wheelchair users need only physical space for their wheelchairs, thus one symbol suffices for them. Blind people need only verbal or tactile translation of visual information, thus one symbol suffices for them. Deaf and hard of hearing people, however, have a broad range of needs and devices which cannot all be represented by a single symbol.

We encourage the use of the various appropriate universal access symbols for Deaf and hard of hearing people, rather than the blanket use of a single inappropriate symbol.

In 2006, the League for the Hard of Hearing (now known as the Center for Hearing and Communication) produced the attached [article](#), which explains all the symbols.

Conclusion:

The ICC needs to update the universal symbol for access to include all disabilities or to replace it with symbols for each form of access. Also, the slashed-ear symbol for people with hearing loss needs to be replaced with the symbols that are illustrated above and explained in the linked article, to

provide people with hearing loss with clarity on the specific hearing access available.

Environmental impact: N/A

Bio:

I am Janice S. Lintz, CEO of Hearing Access & Innovations (HAI) (f/k/a Hearing Access Program). I am a recipient of the 2018 Bill & Melinda Gates Foundation Goalkeepers Partnership with ThePointsGuy.com; 2016 Aspen Institute Spotlight on Health Scholar; 2016 Nominated United State of Women Changemaker by the White House, the US Department of State, the US Department of Labor, and the Aspen Institute; 2015 Delta Salutes; 2008 People magazine's Heroes Among Us; and member of the following: 2013-2015, US Access Board's Committee on Rail Vehicle Accessibility; 2009, NYC Mayor's Office Taxi of Tomorrow Stakeholder Committee; 2008-2014, New York State Interagency Council for Services to the Deaf, Deaf-Blind, and Hard of Hearing, established by Governor David A. Paterson (not currently funded); 2007-2008, US Access Board's Passenger Vessel Emergency Alarms Advisory Committee; 2006-2015, Lower East Side Tenement Museum's Advisory Board; 2004-2008 (two terms), FCC Chairman Kevin J. Martin's Consumer Advisory Committee; and a current member of the Syracuse University Burton Blatt Institute's Advisory Board since 2012. Also, I frequently write on topics related to hearing loss.

Sincerely,

Janice Lintz