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July 29, 2021

The Honorable Eric Garcetti
Mayor, City of Los Angeles
Room 303, City Hall

City Council
c/o City Clerk
Room 395, City Hall

Helene Ramirez, Legislative Coordinator

**SUBJECT: INCORPORATING INDUCTION LOOP TECHNOLOGY IN CITY
INFRASTRUCTURE AND AGREEMENTS**

On behalf of the Commission on Disability (Commission), I am respectfully requesting that your office and the City Council expand the availability of accessible communication systems as a component of new City facilities as well as those undergoing upgrade and refurbishment. We are asking that this be part of a broader effort to ensure that accessibility considerations are explicitly cited as part of all City contracts and agreements with outside vendors, in collaboration with both the City's Department on Disability and City Attorney's Office for input, guidance, and technical assistance. In light of the increased federal infrastructure funding that the City anticipates receiving, this is a particularly opportune window for the incorporation of Induction Loop Technology into proposed infrastructure projects.

Background

Los Angeles City and County are estimated to have the largest concentration of individuals living with some form of hearing loss in the State. In fact, the Southern California region (which includes the County of Los Angeles and seven surrounding counties) has an estimated 800,000 persons who are deaf or hard of hearing. The National Institutes of Health (NIH) reports that one in eight people (13 percent, or 30 million) aged 12 years or older has hearing loss in both ears and that another 28.8 million Americans could benefit from hearing aids. Age is the strongest predictor of hearing loss among adults 20 to 69 years of age. In fact, the rate of hearing loss increases with age, from 2% of adults ages 45-54, to 8.5% of adults ages 55-64, to nearly 25% of adults ages 65-70, and 50% of adults above the age of 70¹.

¹ <https://www.nidcd.nih.gov/health/statistics/quick-statistics-hearing>

Addressing the needs of the deaf or hard of hearing persons who live, work or visit Los Angeles by improving accessible communication is a vital component of LA's post-pandemic growth. Communication accessibility is especially important throughout Los Angeles's travel and tourism infrastructure, which are key drivers of LA's economy.

The risk management benefit of systemic improvements in hearing access is clear, especially as the number of ADA Title II and III Federal Lawsuits filed increased year over year for the last decade, surpassing eleven thousand (11,000) in 2019.² California bears a disproportionate number of such actions. The City has the opportunity to be proactive in avoiding costly lawsuits related to City facilities, as well as supporting the efforts of local businesses to become compliant. Advances in accessible technology improve our ability to provide reasonable accommodations under the ADA and other federal law.

Induction Loop Technology (ILT) has been successfully utilized in many government buildings, museums, and entertainment venues both across the country and around the world and is a tested and community-approved means of ensuring access.

There are numerous benefits for both ILT users and facility operators. Unlike the burdensome FM radio or other transceivers often used in places of public accommodation, ILT is inherently sanitary and not prone to basic functional issues like being out of batteries, or improperly configured. In the context of transportation, ILT can allow for direct communication from a bus or rail driver to ILT users, compared to the limits of pre-programmed text and captioning. Essentially, ILT allows for more discrete and independent accessibility.

As such, the Commission on Disability recommends that all City vendor contracts and agreements contain language requiring accessible communication for programs and facilities, and that public facilities and transportation projects (whether new developments or refurbishing), include Induction Loop Technology (ILT) wherever a public announcement system or other audio system will be used regularly to communicate information to the public.

In partnership with the Department on Disability, the Commission can advise and connect the City with persons knowledgeable in the implementation of such technology, with the goal of placing Los Angeles at the forefront of cities leading in access and accommodation.

Should you have any questions, you may contact Peter Soto of the Department on Disability by phone at (213) 202-2751 or by email at peter.soto@lacity.org

Sincerely,



Myrna Cabanban
President, Commission on Disability

cc: Councilmember Nury Martinez, President, City Council
Councilmember John Lee, Chair, Arts, Parks, Health, Education, and Neighborhoods Committee

² <https://njbja.org/ada-lawsuits-on-the-rise-2019-another-record-breaking-year/>