



30 June 2025

Dr. Reji Mathai,
Director-ARAI,
The Automotive Research Association of India,
Survey No. 102, Vetal Hill,
off Paud Road, Kothrud,
Pune - 411 038, India
Email : director@araiindia.com

Dear Dr. Mathai,

Subject : [FMC inputs](#) on [Draft AIS-216](#) (published 30 May 2025 for stakeholder feedback till 30 June 2025)

The Freedom of Movement Coalition (FMC) is a pan-Indian movement advocating for equity and parity in transport.

FMC has been actively intervening on India's accessibility mandate under the Rights of Persons with Disabilities Act 2016 for schemes like FAME-II, CESL's Grand Challenge, PM eBus Sewa and PM E-Drive as well as procurement accessibility in states like Tamil Nadu and Karnataka.

Draft AIS-216/DF/ May 2025 (Code of Practice for Bus Body Design and Approval For Type 1 Buses) purports to extract relevant sections of India's Bus Body Code AIS-052 and AIS-153 as they pertain to city travel use or Type-I buses.

While a new standard is itself an unnecessary exercise; (instead, the Bus Body Code would benefit from a merging of AIS-052 and AIS-153 removing all ambiguities and more closely resembling the UNECE-R107 on which it is fashioned), FMC was dismayed to note the following regressive additions made :

2.2.19.6

All Type I buses **irrespective of floor height** shall be accessible for people with reduced mobility including at least one wheel chair user according to the technical provisions laid down in Appendix V.

And

The addition to Annexure V

3.6.2

For buses with floor height **upto 900 mm** the boarding device shall be **a lift or ramp**. However, for buses with floor height above 900 mm the boarding device shall be a lift.

For buses deployed on BRTS (Bus Rapid Transit System) routes where level boarding is available, boarding devices viz., ramp and lift are not required.

The usage of the term '**level boarding**' is key given its absence in the Bus Body Code. so far, though subsequent to the National Urban Transport Policy 2006 and the Urban Bus Specifications (UBS), the thrust on low floor bus rollout led to the [2012 MoHUA advisory on bus platform height standardisation to 400 mm](#) for ordinary city bus service so as **to enable level boarding and universal access along with minimal dwell time for urban settings**.

A modern city bus eco-system can only be one of level boarding with step-free entry, whether via kneeling low floor bus or the BRTS system.

This is the obvious choice as it is a universal design, enabling accessibility for wheelchair users and other passengers with reduced mobility (PRM).

FMC is appalled at the further dilution of the Bus Body Code by the ludicrous proposition in 3.6.2 that a wheelchair user can board a bus of 900 mm floor height via a ramp! Even more astounding is the reference to buses with heights greater than 900mm - such a vehicle would be of truck chassis height and can no longer be called a bus - even in 2012 the UBS-II capped bus height as 900 mm!

It is shameful that the nation seems to be going backwards, rather than forward with respect to basic public transport with the recent high floor electric bus an anachronistic embarrassment! A century after buses diverged from trucks in evolution, buses still largely run on truck chassis!

With regard to safe wheelchair accessibility to city buses in Indian traffic, while wheelchair lifts are deployed for long distance travel in buses elsewhere in the

modern world, the rationale for the high floor bus is due to luggage being stored at the base, not a truck masquerading as a mover of people!

The stage carriage model of city bus services, characterised by time-sensitive fixed routes with frequent stops unseparated from city traffic via bus lanes (with the exception of a fraction of BRT) is not compatible with wheelchair lifts.

Furthermore, it poses morally unacceptable safety hazards to wheelchair users given unruly Indian traffic. The [Madras High Court in 2024](#) has recognised this by stating, "The lift system which was sought to be used in the high floor buses is admitted to be a failure by both sides. Besides, with the kind of crowd in the metropolitan cities, it is impossible to operate such lifts to enable the wheel-chair bound commuters to get inside the bus."

Invoking [UNECE R107](#) as a reference source for this draft is inappropriate, given that AIS-216 further dilutes accessibility provisions in AIS-052 and AIS-153; where the UNECE R107 is being [amended to expand accessibility provisions](#).

FMC urges the withdrawal of the extraneous draft - instead prescriptive specifications like the UBS-II, could be incorporated and expanded (specifications for **hilly regions**, for example, if the current Type-I, II, III classification requires more granular detailing.)

Crucially, to remove all ambiguities / inconsistencies going forward. FMC urges that AIS-052 specify clearly that:

A) All intra-city public service vehicles (including Type-I, mini or micro buses) shall be low floor, (with a maximum ground to floor height of 400 mm), wheelchair ramp and wheelchair securement space with tie-down restraints (WTORS).

B) All inter-city public service vehicles (including Type-2 buses) shall be either low floor with wheelchair ramp, or be equipped with a lift like long distance (Type-3) buses and shall be equipped with WTORS and wheelchair storage area.

Furthermore, AIS-052 and AIS-153 may be merged and harmonised (after rectifying the earlier diluting amendments on ramp gradient, guide dog space etc) while upgrading India's Bus Body Code & Specifications to be in sync with [accessibility-related amendments](#) in UNECE R107 scheduled to be formalised in the upcoming [WP-29 November 2025 session](#).

The law has been abundantly clear for a while now on comprehensive bus accessibility for all public service vehicles, including those run by private operators,

whether Type I, II or III.

In [2018](#) , the apex court stated that “all government or private owned public transport carriers are to be made accessible by March 2018.”

It is a travesty that disabled citizens of India continue to endure restrictions to their Freedom of Movement due to the competent authority’s refusal to modernise bus travel and comply with the law of the land.

We look forward to your cooperation in reforming the Bus Body Code and transforming bus travel for every citizen of our country, irrespective of disability status.

Regards,

Freedom of Movement Coalition

THE FREEDOM OF MOVEMENT COALITION is a pan-Indian group advocating for equity in transport. We can be reached at freedom-of-movement-coalition@googlegroups.com

Coalition Members :

- Adv. K.R. Raja • Centre for Accessibility in Built Environment (CABE) • December 3 Movement (D3M) • Disability Law Initiative • Disability Rights Alliance (DRA) • Diversity and Equal Opportunity Centre (DEOC) • Ektha • Global Network for Equality (GNE) • Human Rights Law Network (HRLN) • National Centre for Promotion of Employment for Disabled People (NCPEDP)
- National Platform for Rights of Disabled (NPRD) • Nileshe Singit • Nipun Malhotra • Odisha State DisAbility Network • Rahul Bajaj • Rajive Raturi • Samarthyam, National Centre for Accessible Environments • Dr. Satendra Singh • Shishu Sarothi • Sruti Disability Rights Centre • Swabhiman