

## **Canada APPR Amendments**

### **TAP Comments**

#### **Background**

The Agency provides no justification or evidence that the existing sanctions are not sufficient.

#### **Objective**

Nothing in the proposed amendments that will reduce delays or cancellations. The APPR among other objectives should deliver improved performance of the air travel system in Canada, measured by increased punctuality and a reduction in cancellations.

#### **Description**

A specific issue with bookings made through intermediaries where the intermediary does not pass contact information to the airlines operating the flights involved. Rather than imposing additional burdens on carriers and all passengers. It is important that CTA to address this issue head-on, with a requirement for intermediaries to either a) pass contact information on to the carriers or b) be liable with complying with all the information requirements e.g. updating passengers in case of disruption. The proposed solution of requiring information to be collected and/or validated at check-in would be time-consuming and complex, regardless of whether check-in is

performed remotely or at the airport. It would also not benefit passengers in the event of a need to communicate with passengers prior to check-in for example to provide advance notice of disruption and potentially save passengers the time and inconvenience of travelling to the airport unnecessarily. Allowing passengers to make a claim with any carrier on an itinerary affected by disruption is unhelpful. This would require airlines to put systems in place to transmit claims between carriers – including non-partner airlines – and to avoid duplicative claims. The costs of putting these processes and/or systems in place are not reflected in the Cost-Benefit Analysis. Claims should be submitted to the operating carrier of the affected flight. The proposals would open the door to Claim Farms developing in the Canadian market. The CTA should clarify the wording to specify that the intent is to allow persons such as family members to act on behalf of the passenger and not commercial entities. The list of exceptional circumstance should be binding but non-exhaustive and the list should be subject to periodic review. If the 72-hour limitation refers to a prolonged and systemic disruption affecting a significant part of the aviation network . It would be useful for the CTA to clarify its intentions. To avoid grey areas. In the event of a refund, in order to harmonize the applicable rules, the flight departure delay must be set at 5 hours. The CTA provides no justification or evidence that the existing sanctions are not sufficient.

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