

## **Submitted by email to the Canadian Transportation Agency**

**Name:** Air Canada – Kerianne Wilson

**Subject:** Demandes d'exemption du RTAPH / ATPDR Exemption Requests - Cas(e)  
No. 20-09256 - Air Canada's Response

Dear Secretariat,

We thank you for the opportunity to respond to the April 13, 2021 joint submission by the disability rights organizations regarding air carriers' requests for exemption to the Accessible Transportation for Persons with Disabilities Regulations (ATPDR).

As the Agency is well aware, the agreement between Air Canada and the Government of Canada regarding financial assistance was concluded on the basis of particular needs on the part of Air Canada and clear policy objectives on the part of the Government. These objectives include offering refunds to eligible customers who purchased non-refundable fares but did not travel as a result of the pandemic, resumption of service to certain regional communities where service was suspended because of the pandemic's impact on travel, preserving current employment levels, and the completion of the acquisition of certain aircraft. Full implementation and compliance with ATPDR or the pending exemption requests therewith were not contemplated in the negotiation of this agreement. As such, the same issues of lack of resources and personnel justifying the exemption requests remain unchanged, and the funding received by Air Canada is not relevant to the Agency's assessment.

On this basis, Air Canada urges the Agency to proceed in issuing the exemptions. We can assure you that the rebuilding of our airline, when the time comes, will be done with accessibility in our DNA.

Kind regards,



**Kerianne Wilson**

Senior Customer Regulatory & Resolution Counsel  
Avocate sénior, Clientèle – Résolution et Réglementation  
T 514 422-5959

[kerianne.wilson@aircanada.ca](mailto:kerianne.wilson@aircanada.ca)