



Montreal, December 11<sup>th</sup>, 2020

Canadian  
Transportation Agency  
15 Eddy Street  
Gatineau, QC K1A 0N9

**RE: ATPDR – Air Transat - Request for further delay of certain provisions due to the ongoing impacts of the COVID-19 pandemic**

Dear Madam, Dear Sir,

Thank you for allowing us to request further delays to the coming-into-force of certain provisions of the Accessible Transportation for Persons with Disabilities Regulations (ATPDR), due to the ongoing impacts of the COVID-19 pandemic. Air Transat fully endorses and reiterates NACC position, whose communication will be sent out to you later today.

As such, Air Transat has been greatly impacted by the pandemic which has brought related restrictions over travel and has forced us to stop all operations for 4 months (April to July 2020), and restart with very limited operations thereafter.

This situation has had a very significant impact on our treasury. We have recorded substantial revenue losses; hence we have since then been making every effort to protect cash flow. This is very well reflected in our financial year-end results, which will be published by end of day December 11<sup>th</sup>, 2020, and is publicly available on Sedar website.

In addition, the pandemic has forced Air Transat to reduce staff and only 25% of employees are currently actively working. Notwithstanding the lack of resources this year, we did implement the majority of the requested changes within ATPDR requirements.

We, at Air Transat, are committed to make every effort to ensure everyone get fair chances to fly with us, independently of their personal condition.

Below if the list of provisions for which we are unable to comply by the set deadline of January 1<sup>st</sup>, 2021 and would request for an extension. We have indicated the targeted date to comply:

If you require further details or information, please do not hesitate to contact us.

Best regards,

Marie-Hélène Scardigli  
Project Manager

**Transat A.T. inc.**

Tour Transat  
300, rue Léo-Pariseau, bureau 600  
Montréal, Québec, Canada H2X 4C2

Téléphone : 514 987-1660

[www.transat.com](http://www.transat.com)

Section	Sub	Subject	Directive	Current status	Takes effect	Target Date expected to fully comply
	9	Internet sites-standards	All sites the carrier owns, operates or controls that is public including mobile and apps must meet Level AA in the W3C, WCAG 2.0	Partially in practice	extension to Dec 31st 2020	June-2022
	10	Public announcements in terminals	<p>Carrier must ensure any announcement made inside a terminal including departure, delay, gate change is made in audio and visual format.</p> <p>Public announcements inside terminals</p> <p>10 (1) A carrier must ensure that any public announcement relating to a departure or a gate or track assignment that is made for passengers waiting at a boarding area inside a terminal is made in an audio format and in a visual format.</p> <p>Public announcement — safety or security</p> <p>(2) If a transportation service provider makes any public announcement relating to safety or security inside a terminal, they must make that announcement in an audio and visual format.</p>	Partially in practice	juin-20 for 10 (1) Dec 31st 2020 for 10 (2)	June-2021 for Candian Airports TBA for international airports

Section	Sub	Subject	Directive	Current Status	Takes effect	Target Date expected to fully comply
	<b>15, 16, 17, 18, 19</b>	Training requirements	Carrier must ensure training is provided to those who interact with the public or make decisions, policies or procedures regarding the regulation requirements. Training must be appropriate to their functions including the p & p with respect to pax with disabilities including regulatory requirements, need of those who require services including the level of assistance, role of a support person, needs of a service dog, methods of communication and assistive devices, matter of communicating, and the skills to provide assistance to those with disabilities. Specific levels of training required for: those who provide physical assistance; those who handle mobility aids; those who use or assist with special equipment which includes TTY, lifts, devices to connect, IFE, kiosk.	Partially in practice	extension to Dec 31st 2020	<b>Ground Handling &amp; Ramp only: June-2021 for Canadian staff and subcontractors TBA for international subcontractors</b>  <b>Call Centre and inflight training: compliant</b>
	<b>20, 21</b>	Training conditions	Personnel must be trained within 60 days, and must be supervised if not trained. Recurrent no less than every 36 months. New information or policy for accessibility must be disseminated as soon as possible. People must be trained on special equipment (kiosk, ife, lifts, telecommunication devices)	Mostly in practice	extension to Dec 31st 2020	<b>Ground Handling &amp; Ramp only: June-2021 for Canadian staff and subcontractors TBA for international subcontractors</b>  <b>Call Centre and inflight training: compliant</b>
	<b>23</b>	Training programs	Each training program must follow training requirements, include consultation with persons with disabilities for development of program and teaching methods, available for inspection by the agency, and kept up to date, and make it publicly available on request. See schedule for detailed requirements	Not in practice	extension to Dec 31st 2020	<b>Ground Handling &amp; Ramp only: June-2021 for Canadian staff and subcontractors TBA for international subcontractors</b>  <b>Call Centre and inflight training: compliant</b>

Section	Sub	Subject	Directive	Current Status	Takes effect	Target Date expected to fully comply
	35	Assistance to be provided	Carrier must provide without delay: assist pax to check in; permit the pax to go to front of line if they cannot use kiosk; assist the pax through security with an escort or issuance of a gate pass for the pax's non travelling escort; assist the pax to the boarding area; transfer the pax to an aisle chair, transfer the pax to their seat; assist the pax to board and disembark; assist the pax to store and retrieve their carry on baggage; brief a pax who is blind on layout, locations of lavs, exits, and use of controls and seat; assist pax to access ife content including providing a device; give individual safety briefing; provide an on board wheelchair; assist to and from the lav using the on board chair; permitting pax to use the largest lav regardless of class of service for those in the chair or with a service animal; on board describe meal and offerings or provide a large print or braille menu; on board, assist to open packages, identify food items, and cut larger ones; assist pax through immigration and customs; assist to retrieve checked baggage; assist to the public area; assist to the curbside assistance area; assist to another carrier in the same terminal.	Mostly in practice	juin 2020	<b>We are compliant on all services except for pax's non travelling escort. This has a significant impact on our systems which do not support non travelling escort associated to a PNR. Would require extensive analysis and cost evaluation by our suppliers</b>

Section	Sub	Subject	Directive	Current Status	Takes effect	Target Date expected to fully comply
2 - Services	39	Personal electronic device	Carrier must provide on request a ped referred to in 81/117/164/205		extension to Dec 31st 2020	<b>March 31st, 2021</b>
2 - Services	40, 41, 43	Mobility aids	Mobility aids must be carried as priority baggage. Pax should be able to keep their aid until it needs to be stowed. Carrier must remove other baggage or cargo to make room for an aid. Carrier must assemble and disassemble aid on arrival and departure promptly, and can ask for written instructions and earlier check in or boarding to do so. Walkers and folding manual chairs should be permitted on board where possible. (reasonable effort)	In practice	juin 2020	<b>compliant except for folding manual chairs cannot be accepted on board as we do not have sufficient storage space, will be stowed in Cargo.</b>
2 - Services	57	On board public announcements	On request, a carrier must ensure a public announcement is made in an audio or visual format.	Mostly in practice	juin-20	<b>March 31st, 2021</b>

Section	Sub	Subject	Directive	Current Status	Takes effect	Target Date expected to fully comply
	75	Tactile row markings	Aircrafts must have tactile row markers with raised letters and braille on sides of seats and above the armrests OR adjacent to the mechanisms for opening overhead bins.	Partially in practice	juin-20	<b>March 31st, 2021</b>
	78	Washroom standards to be considered wheelchair accessible	Wheelchair accessible washroom must meet all of 77, and; have an opening with sufficient space in front and door is wide enough to allow entry of a person using the onboard wheelchair; have privacy using walls or curtains to allow a support person or animal to remain in the lav; have faucets easily used by the person in the chair.	Partially in practice	juin-20	<b>Not applicable for A321 (narrow-bodied) A330 adjustments:</b> <ul style="list-style-type: none"> <li>• <b>replace door handles to the lever type</b></li> <li>• <b>install privacy curtains Target date March 31st, 2021</b></li> </ul>
	81	IFE-pre-existing aircraft	If a pre-existing aircraft has a system that doesn't offer cc or audio descr, must add PED's to accommodate ppl with disabilities who made a request. PED must be preloaded or be able to stream same or comparable content.	Not in practice	extension to Dec 31st 2020	<b>March 31st, 2021</b>