

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

**Name:** Airlines for America

**Subject:** ATPDR Exemption Requests - Case No. 20-09256

Secretariat,

On behalf of our Members that provide air transportation services between the United States and Canada, we thank you for the opportunity to reply to the April 13, 2021 joint submission by the disability rights organizations regarding air carriers' requests for exemption to CTA's Accessible Transportation for Persons with Disabilities Regulations (ATPDR).

If the CTA takes any financial support by the Federal Government into consideration, which it should not for the reasons explained by Air Canada in its reply, the CTA must recognize that such financial support is not available to foreign air carriers. In other words, the financial support has no bearing on foreign air carriers' need for exemptions and should be disregarded. Although foreign carriers may receive support from foreign governments, it is often conditioned or limited, such as the requirement by the U.S. Government that funding be used for payroll support, and should also be disregarded by the CTA. As the CTA is well aware, the pandemic has had and continues to have a devastating impact on the airline industry and the overwhelming justifications for granting the exemptions to the ATPDR set forth in the original petitions remain.

We also support Air Canada's reply to the joint submission.

We thank the CTA for this opportunity to correct the record and urge the CTA to issue the exemptions without further delay.

Very respectfully,

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