

Submitted to the Canadian Transportation Agency (Form submission)

Subject: Consultation on proposed changes to strengthen the Air Passenger Protection Regulations

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The following changes are required:

- the burden of proof needs to be with the airlines, rather than the consumers. Consumers don't have access to any information.
- The default should be the airline pays, with the only exception with a weather related event. Current process for the claim to be adjudicated is too onerous for the consumer. This will reduce the number of Federal officers working on this, Airlines will pay an only apply for exception under very narrow circumstances. No need to maintain the large bureaucracy supporting this.
- Eliminate the loophole of "unforeseen mechanical issue". This is a way for Airlines not to pay. Any mechanical issue is the airline responsibility.

In sum, Canadian regulations should mimic the European ones.