

Submitted to the Canadian Transportation Agency (Form submission)

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

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Date: 2023-07-16

This APPR rules are penalizing an incredibly fragile and fundamental industry, just for politics. If the policy makers are not aware, not only are Canadian carriers operating in some of the harshest conditions in the world, with small populations and large flight distances, but also an environment where most of the infrastructure is run by third parties of which airlines have no control. Airports, Gates, baggage facilities, security, customs, ATC all are controlled by 3rd parties that not only often cost airlines and consumers more than our US counterparts but are inefficient and uncoordinated. The government itself is also a contributor to delays based on administrative processing of things like SOP amendments, medical and licence processing. Why is the carrier only getting penalized? Why do similar protections not exist for VIA Rail, BC Ferries, or any general retailer?

The path forward is reasonable laws that incentivize our airlines to be the best in the world, but underpinning that has to be incentive for the supporting infrastructure and government to want to do the same. This won't be achieved by one-off political measures like APPR that holds airlines to an exception, but holistic rules that span multiple industries that encourage great products, practices and stewardship for all Canadian consumers.

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