

Submitted to the Canadian Transportation Agency (Form submission)

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

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I have feedback in two areas - Interconnected Service Provides and Communications

Interconnected Service Providers

One area of concern is around the exemption for compensation being awarded due to certain instances considered outside the airline's control including airport facility constraints, air traffic management restrictions, etc. While I agree that airlines should not be financially responsible for these instances there should be a method for the organizations responsible to be held accountable for these circumstances when reasonably within their control (ex. staffing shortages). As examples it would seem reasonable to refund airport improvement fees when airport facility constraints are the cause of the delay, Nav Canada surcharges could be refunded when delays are due to air traffic management, Air Travellers Security Charge when delays are due to issues with CATSA or CBSA.

Communications

While the proposed regulations enhance the communications which passengers receive from airlines in delay situations, they do not address the challenges which passengers frequently experience when needing to reach an airline representative for assistance with rebooking. During recent delay events in Canada it has often been impossible to reach a representative on support phone lines and/or online tools fail to work correctly. Regulations could be strengthened by mandating a maximum telephone wait time and/or a functional online rebooking tool.

