

Submitted to the Canadian Transportation Agency (Form submission)

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

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Overall, the recommended changes are unfair to passengers. Ultimately, this is a question of who is the government imposing risk on. This is not something that requires a lot of evidence, just basic common sense. Should the risk be put on passengers who are generally not wealthy, who lack information about the airline industry and who may have many costs associated with arriving at a destination on time (hotels, meetings, etc) or should the risk be imposed on airlines that have wealthy owners, high information about travel risks, etc? In almost all cases, the correct answer is that the risk should be on the airlines. The legislation is clear about that. The proposals instead put far too much risk on passengers, contrary to the legislation. "Exceptional circumstances" include circumstances that occur regularly, like rain. More details are included in the attached document.

<Attachment removed for privacy reasons>